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April 22, 2025
Project No. M0747.01.014

Michael R. Warfel, LG, LHG, RG
Washington State Department of Ecology
15700 Dayton Avenue N
Shoreline, WA, 98133

Re: Compliance Groundwater Monitoring Event
North Cascade Ford Property, Sedro-Woolley, Washington
VCP Number: NW3031; CSID: 12075; FSID: 5813566

Dear Michael Warfel:

In March 2025, on behalf of VSF Properties, LLC, Maul Foster & Alongi, Inc. (MFA), conducted monitoring well sampling activities at the North Cascade Ford property, located at 116 W Ferry Street in Sedro-Woolley, Washington (the Property) (see Figure 1). The North Cascade Ford Site (the Site) includes the Property and a portion of the adjacent property to the north, owned by the BNSF Railway (see Figures 1 and 2).

Activities were conducted consistent with the Confirmation Groundwater Monitoring Plan (CGMP) described in environmental covenant no. 202210190027 recorded in Skagit County (Environmental Covenant), the groundwater compliance monitoring plan (CMP) (MFA 2020a), the addendum to the groundwater CMP (MFA 2020c), and the Washington State Model Toxics Control Act (MTCA; Washington Administrative Code 173-340-410(c)) requirements for confirmation monitoring.

Background

Previous investigations identified environmental impacts in three areas of the Site, referred to as areas of concern (AOCs) 1 through 3 (MFA 2020b). In March 2020, a remedial action was completed in AOCs 1 through 3 (MFA 2020b). Following completion of the remedial action, the groundwater CMP and an associated addendum were developed in coordination with the Washington State Department of Ecology (Ecology) to guide performance groundwater monitoring at the Site (MFA 2020a, 2020c). Per Washington Administrative Code 173-340-410(c), the purpose of confirmation monitoring is to confirm that a remedial action has attained cleanup levels (CULs). Eight quarterly confirmation groundwater monitoring events related to the March 2020 remedial action were conducted between September 2020 and June 2022 (MFA 2020d, 2021a, 2021b, 2021c, 2021d, 2022a, 2022b, 2022c).

Chemicals of concern in AOCs 1 through 3 include diesel-range organics (DRO), lube-oil-range organics (ORO), gasoline-range organics, BTEX constituents (benzene, toluene, ethylbenzene, and total xylenes), and total naphthalenes. Groundwater monitoring is limited to DRO and ORO following Ecology approval on September 9, 2021 and the CGMP (Ecology 2021a). Table 1 shows historical groundwater analytical results associated with monitoring wells in AOCs 1 and 2 and reconnaissance groundwater samples collected in AOC 3 prior to initiating monitoring in September 2020.

On September 9, 2021, Ecology approved the reduction of monitoring for constituents at the Site (i.e., limiting monitoring to DRO and ORO), as well as the removal of monitoring wells MW06 and MW12 from the compliance monitoring network (Ecology 2021a).

On December 10, 2021, Ecology requested additional analysis for two monitoring wells—1,4-dichlorobenzene for MW09 and naphthalenes for MW10—due to previous detections in those areas of the Site above the vapor intrusion screening level (Ecology 2021b). These additional constituents were not detected in groundwater analyses conducted during the December 2021 monitoring event at MW09 and MW10. On March 15, 2022, Ecology concurred with eliminating sampling for naphthalenes and 1,4-dichlorobenzene for future groundwater monitoring events (Ecology 2022a).

On April 6, 2022, Ecology approved the removal of monitoring well MW11 from the monitoring network (Ecology 2022b).

On January 4, 2023, Ecology presented its No Further Action (NFA) opinion for the Property contingent upon the continued performance and effectiveness of the post-cleanup controls and monitoring specified in the NFA letter and the environmental covenant no. 202210190027 for institutional controls (Ecology 2023a).

On March 2, 2023, the first groundwater monitoring report was submitted to Ecology, conducted in November 2022, related to the post-cleanup controls and monitoring specified in the NFA letter and the environmental covenant no. 202210190027 for institutional controls (MFA 2023a).

On June 12, 2023, the City of Sedro-Woolley informed Ecology that railroad ties were temporarily stored on the Property. It was determined that three monitoring wells (MW01R, MW09, and MW10) were damaged, and the gravel cap was disturbed from the placement of railroad ties. The damaged monitoring wells were decommissioned, and three replacement wells (MW01R2, MW09R, and MW10R) were installed and developed in September and October 2023 in accordance with the Ecology-approved work plan (Ecology 2023b, MFA 2023b). Gravel contaminated with railroad tie debris was excavated and removed from the Property. Clean imported gravel was placed on the Property to restore the gravel areas. A completion report summarizing restoration activities was submitted to Ecology on October 27, 2023 (MFA 2023c).

On October 30, 2023, Ecology concurred restoration was complete and issued a Resolution of Non-Compliance with Terms of Environmental Covenant for the Property (Ecology 2023c).

On March 15, 2024, the second groundwater monitoring report was submitted to Ecology, conducted in December 2023, related to the post-cleanup controls and monitoring specified in the NFA letter and the environmental covenant no. 202210190027 for institutional controls (MFA 2023a).

Field and Analytical Methods

All March 2025 groundwater monitoring activities were conducted consistent with the CGMP; the groundwater CMP (MFA 2020a), the addendum to the groundwater CMP (MFA 2020c), and Ecology-approved modifications to the CMP provided via email (Ecology 2021a, 2021b, 2022a, 2022b). Monitoring well locations are shown on Figure 2.

Potentiometric Surface Evaluation

On March 13, 2025, MFA measured static water levels in the compliance monitoring wells (see Table 2). A potentiometric surface map is provided as Figure 3. The estimated potentiometric surface contours indicate that shallow groundwater at the Site is variable and show groundwater migration to the south with some localized variations, consistent with previous observations. Water levels

measured during this event were generally 1.6 feet higher than levels in the December 2023 monitoring event. The average height of the water table in March 2025 was approximately 0.8 feet lower than in March 2022 and 0.1 feet lower than in March 2021.

Monitoring Well Sampling

On March 13, 2025, MFA collected seven groundwater samples from six compliance monitoring wells on the Property (MW01R2, MW02R, MW04, MW07, MW09R, and MW10R), including a field duplicate sample from monitoring well MW10R. Water quality field parameters (temperature, specific conductance, pH, dissolved oxygen, oxygen reduction potential, and turbidity) were stabilized before sample collection. During purging, the flow rates, water levels, and water quality parameters were recorded on field sampling data sheets (see Attachment A). Under standard chain-of-custody procedures, groundwater samples were submitted to Friedman & Bruya, Inc., of Seattle, Washington, for laboratory analysis.

Results

The laboratory analytical report is provided as Attachment B, and analytical data are presented in Table 3 and Figure 4. Site trends for DRO, ORO, and heavy oils (the sum of DRO and ORO) are presented in Figures 5, 6, and 7, respectively. Figure 8 shows the site trends for heavy oils from 2019 to 2025 to more clearly depict concentration trends that have occurred since the 2020 remedial action. Analytical data and the laboratory's internal quality assurance and quality control data were reviewed to assess whether they met project-specific data quality objectives. A data validation memorandum summarizing data evaluation procedures, data usability, and deviations from specific field and/or laboratory methods is included as Attachment C. The data, with the appropriate data qualifiers assigned, are considered acceptable for their intended use. Friedman & Bruya, Inc. flagged all detected NWTPH-Dx diesel-range hydrocarbons results for having chromatographic patterns that did not resemble the fuel standards used for quantitation. These results were reported as diesel-range hydrocarbons instead of specific fuel products; thus, qualification was not required.

All groundwater samples were analyzed for DRO and ORO, and heavy oils were calculated by summing DRO and ORO concentrations (one-half the method reporting limit is used for non-detect values) for comparison to the DRO MTCA Method A CUL.

AOC 1: Former Auto Repair Shop

Three groundwater samples were collected from AOC 1 monitoring wells: one each from MW01R2, MW07, and MW09R.

All detections of DRO and ORO, as well as the sum of heavy oils in AOC 1, were below their respective MTCA Method A CULs. This is the sixth consecutive monitoring event with all monitoring wells having concentrations of heavy oils either non-detect or below their respective MTCA Method A CULs.

AOC 2: Former Underground Storage Tanks

Four groundwater samples, including one field duplicate at MW10R, were collected from AOC 2 monitoring wells MW02R, MW04, and MW10R.

All detections of DRO, ORO, and heavy oils in groundwater samples at MW02R, MW04, and MW10R were below their respective MTCA Method A CULs. This is the first compliance monitoring event where the concentration of heavy oils for MW02R is below the MTCA Method A CUL.

Historically, elevated concentrations at MW02R have been observed when there is a localized flow direction to the south within AOC 2, which has been generally correlated with lowering concentrations of heavy oils at MW10/MW10R. Monitoring well MW04 has consistently had concentrations of heavy oils below the MTCA A CULs since compliance monitoring began in September 2020 (totaling 12 sampling events). This suggests the residual concentrations of heavy oils in AOC 2 are limited to the localized area between MW10/MW10R and MW02R, in the coarser grained material used as backfill following the 2016 interim remedial action. It is anticipated that the concentrations of heavy oils will continue to have seasonal fluctuations as residual petroleum concentrations remain localized in the backfill material of AOC 2 and are unlikely to migrate to other areas of the Property (MFA 2024).

AOC 3: Former Coal Storage Sheds/Possible Buried Object

Ecology approved the removal of MW11 from the compliance monitoring network (Ecology 2022b). Therefore, no groundwater samples were collected from AOC 3.

Summary

Results from the groundwater monitoring indicate the following:

- AOC 1
  - No detections of DRO, ORO, or heavy oils exceeded their respective MTCA Method A CULs at MW01R2, MW07, and MW09R.
  - MW01R/MW01R2 has had 11 consecutive monitoring events of DRO, ORO, and heavy oils concentrations below their respective MTCA Method A CULs.
  - MW07 has had seven consecutive monitoring events of DRO, ORO, and heavy oils concentrations below their respective MTCA Method A CULs.
  - MW09/MW09R has had six consecutive monitoring events of DRO, ORO, and heavy oils concentrations below their respective MTCA Method A CULs.
- AOC 2
  - No detections of DRO or ORO or heavy oils exceeded their respective MTCA Method A CULs at MW02R, MW04 and MW10/MW10R.
  - MW02R has had one monitoring event of DRO, ORO, and heavy oils concentrations below their respective MTCA Method A CULs.
  - MW04 has had 12 consecutive monitoring events of DRO, ORO, and heavy oils concentrations below their respective MTCA Method A CULs.
  - MW10/MW10R has had three consecutive monitoring events of DRO, ORO, and heavy oils concentrations below their respective MTCA Method A CULs.
- AOC 3
  - Compliance monitoring has been discontinued in this AOC.

Recommendations

Eleven monitoring events have been completed at the Property since the remedial action was completed in spring 2020 in accordance with the CGMP, CMP, and subsequent revisions approved by Ecology (MFA 2020a, 2020b, Ecology 2021a 2021b, 2022a, 2022b). Trend plots show heavy oil concentrations are generally decreasing and/or stabilizing below the Method A CUL in monitoring

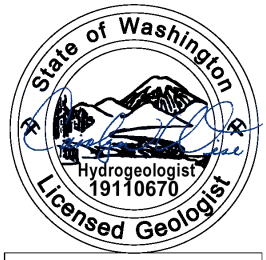
wells during the compliance monitoring period (see Figures 5 through 8). Additionally, free product has not been observed since compliance groundwater monitoring began in September 2020. CULs have been met at all monitoring network wells for more than four consecutive events except at MW02R and MW10, where CULs have been met in one and three consecutive events, respectively. Consistent with the monitoring frequency and requirements outlined in the environmental covenant no. 202210190027, the next monitoring event would be conducted in 15-months in June 2026.

Additional modifications to the groundwater CMP will be assessed during the first periodic review in 2027, following completion of the next (June 2026) monitoring event.

If you have any questions, please feel free to contact us.

Sincerely,

Maul Foster & Alongi, Inc.



Carolyn R. Wise, LHG
Senior Hydrogeologist

Kat Klass
Staff Environmental Scientist

Attachments

References

Limitations

Figures

Tables

A—Water Field Sampling Data Sheet

B—Analytical Lab Report

C—Data Validation Memorandum

cc: Larry Setchell, Setchell NW Legal Services, P.S.

References

Ecology. 2021a. M. Warfel, Washington State Department of Ecology. VCP NW3031 North Cascade Ford, Sedro-Woolley, WA. Email to C. Wise, Maul Foster & Alongi, Inc. September 9.

Ecology. 2021b. M. Warfel, Washington State Department of Ecology. VSF Sedro-Woolley—fifth quarterly GW Report (VCP: NW3031). Email to C. Wise, Maul Foster & Alongi, Inc. December 10.

Ecology. 2022a. M. Warfel, Washington State Department of Ecology. VCP NW3031 North Cascade Ford, Sedro-Woolley, WA. Email to C. Wise, Maul Foster & Alongi, Inc. March 15.

Ecology. 2022b. M. Warfel, Washington State Department of Ecology. VSF Sedro-Woolley – Seventh Quarterly GW Report (VCP: NW3031). Email to C. Wise, Maul Foster & Alongi, Inc. April 6.

Ecology. 2023a. M. Warfel, Washington State Department of Ecology. No Further Action opinion for the following Property associated with a contaminated site; Site Name: North Cascade Ford; Property Address: 116 W. Ferry Street, Sedro Woolley, Washington, 98284; Facility/Site No.: 58313566; Cleanup Site No.: 12075; VCP Project No.: NW3031. Letter to D. Sims, VSF Properties, LLC. January 4.

Ecology. 2023b. M. Warfel, Washington State Department of Ecology. Non-Compliance with Terms of Environmental Covenant, North Cascade Ford Site, 116 West Ferry Street, Sedro Woolley, Washington, 98284, Facility/Site No. 68313566; Cleanup Site No. 12075. Letter to J. Krivanek. June 22.

Ecology. 2023c. M. Warfel, Washington State Department of Ecology. Resolution of Non-Compliance with Terms of Environmental Covenant, North Cascade Ford Site, 116 West Ferry Street, Sedro Woolley, Washington, 98284, Facility/Site No. 68313566; Cleanup Site No. 12075. Letter to J. Krivanek. October 30.

MFA. 2016. Interim remedial action completion report, North Cascade Ford property, Sedro- Woolley, Washington. Maul Foster & Alongi, Inc., Bellingham, Washington. November 8.

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MFA. 2020b. Remedial Action Completion Report, North Cascade Ford Property, Sedro-Woolley, Washington. Prepared for VSF Properties, LLC. Maul Foster & Alongi, Inc., Bellingham, Washington. July 13.

MFA. 2020c. J. Maul, Maul Foster & Alongi, Inc. Addendum to Groundwater Compliance Monitoring Plan, North Cascade Ford Property, 116 W. Ferry Street, Sedro-Woolley, Washington, Facility Site ID: 58313566; Cleanup Site ID: 12075. Memorandum to M. Warfel, Washington State Department of Ecology. August 10.

MFA. 2020d. J. Maul and C. Wise, Maul Foster & Alongi, Inc. Monitoring Well Installation and First Quarterly Compliance Groundwater Monitoring Event, North Cascade Ford Property, Sedro-Woolley, Washington, VCP Number: NW3031, CSID: 12075, FSID: 58313566. Letter to M. Warfel, Washington State Department of Ecology. November 24.

MFA. 2021a. J. Maul and C. Wise, Maul Foster & Alongi, Inc. Second Quarterly Compliance Groundwater Monitoring Event, North Cascade Ford Property, Sedro-Woolley, Washington,

VCP Number: NW3031, CSID: 12075, FSID: 58313566. Letter to M. Warfel, Washington State Department of Ecology. January 26.

MFA. 2021b. M. Murray and C. Wise, Maul Foster & Alongi, Inc. Third Quarterly Compliance Groundwater Monitoring Event, North Cascade Ford Property, Sedro-Woolley, Washington, VCP Number: NW3031, CSID: 12075, FSID: 58313566. Letter to M. Warfel, Washington State Department of Ecology. April 8.

MFA. 2021c. M. Murray and C. Wise, Maul Foster & Alongi, Inc. Fourth Quarterly Compliance Groundwater Monitoring Event, North Cascade Ford Property, Sedro-Woolley, Washington, VCP Number: NW3031, CSID: 12075, FSID: 58313566. Letter to M. Warfel, Washington State Department of Ecology. August 9.

MFA. 2021d. C. Wise and A. Bixby, Maul Foster & Alongi, Inc. Fifth Quarterly Compliance Groundwater Monitoring Event, North Cascade Ford Property, Sedro-Woolley, Washington, VCP Number: NW3031, CSID: 12075, FSID: 58313566. Letter to M. Warfel, Washington State Department of Ecology. November 11.

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MFA. 2022b. C. Wise and C. Sifford, Maul Foster & Alongi, Inc. Seventh Quarterly Compliance Groundwater Monitoring Event, North Cascade Ford Property, Sedro-Woolley, Washington, VCP Number: NW3031, CSID: 12075, FSID: 58313566. Letter to M. Warfel, Washington State Department of Ecology. April 4.

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ZGA. 2017. Draft remedial action report, North Cascade Ford, 116 West Ferry Street, Sedro-Woolley, Skagit County, Washington. Prepared for 116 West Ferry Street, LLC, and Lane Properties. Zipper Geo Associates, LLC, Lynnwood, Washington. September 1.

Limitations

The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

Figures

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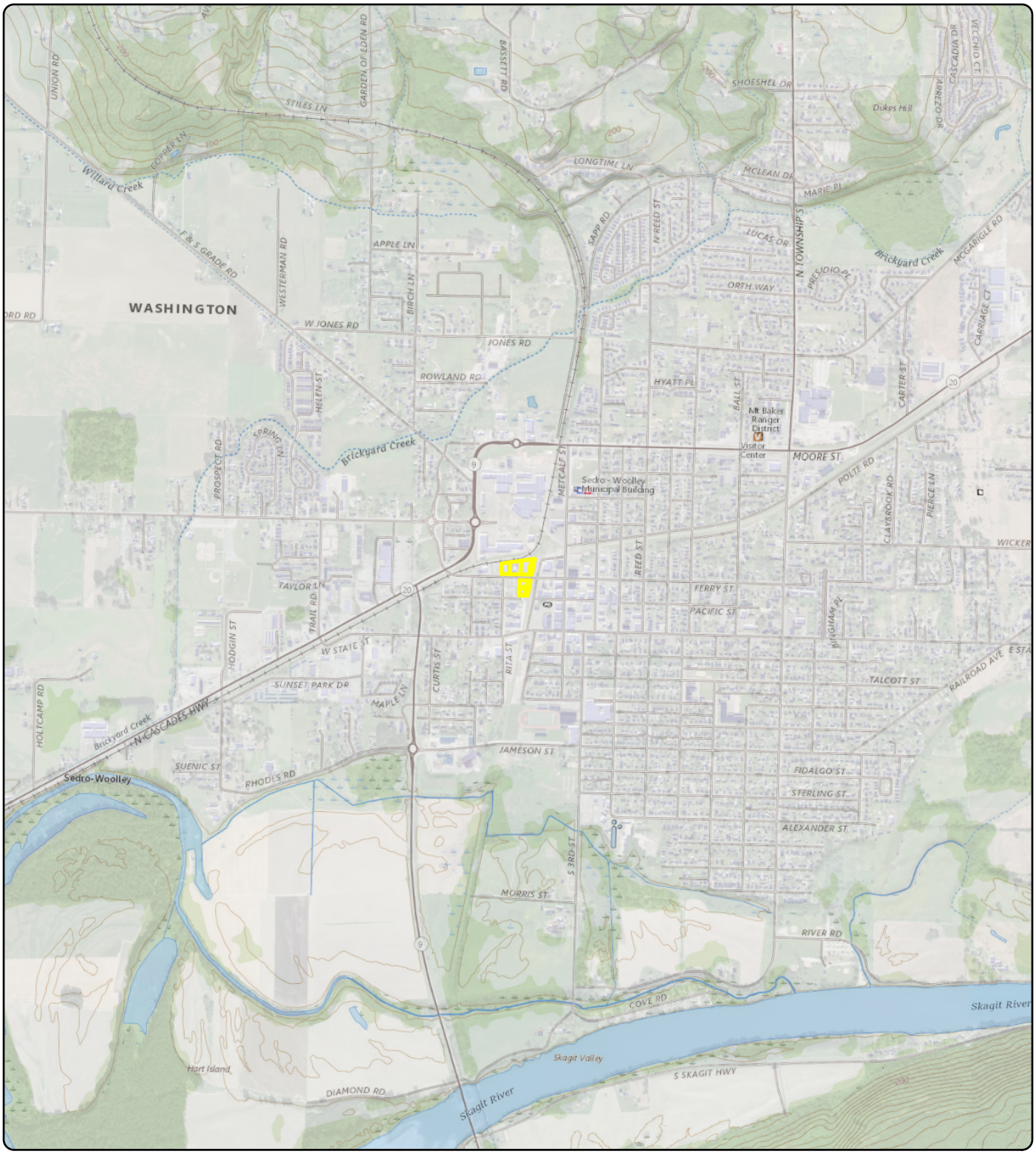

Notes
U.S. Geological Survey 7.5-minute topographic quadrangle (2020): Sedro-Woolley North.
Township 35 north, range 4 east, section 24.

Legend

Property Boundary

Figure 1
Property Location

North Cascade Ford Property
Sedro-Woolley, Washington

0 1,000 2,000
Feet

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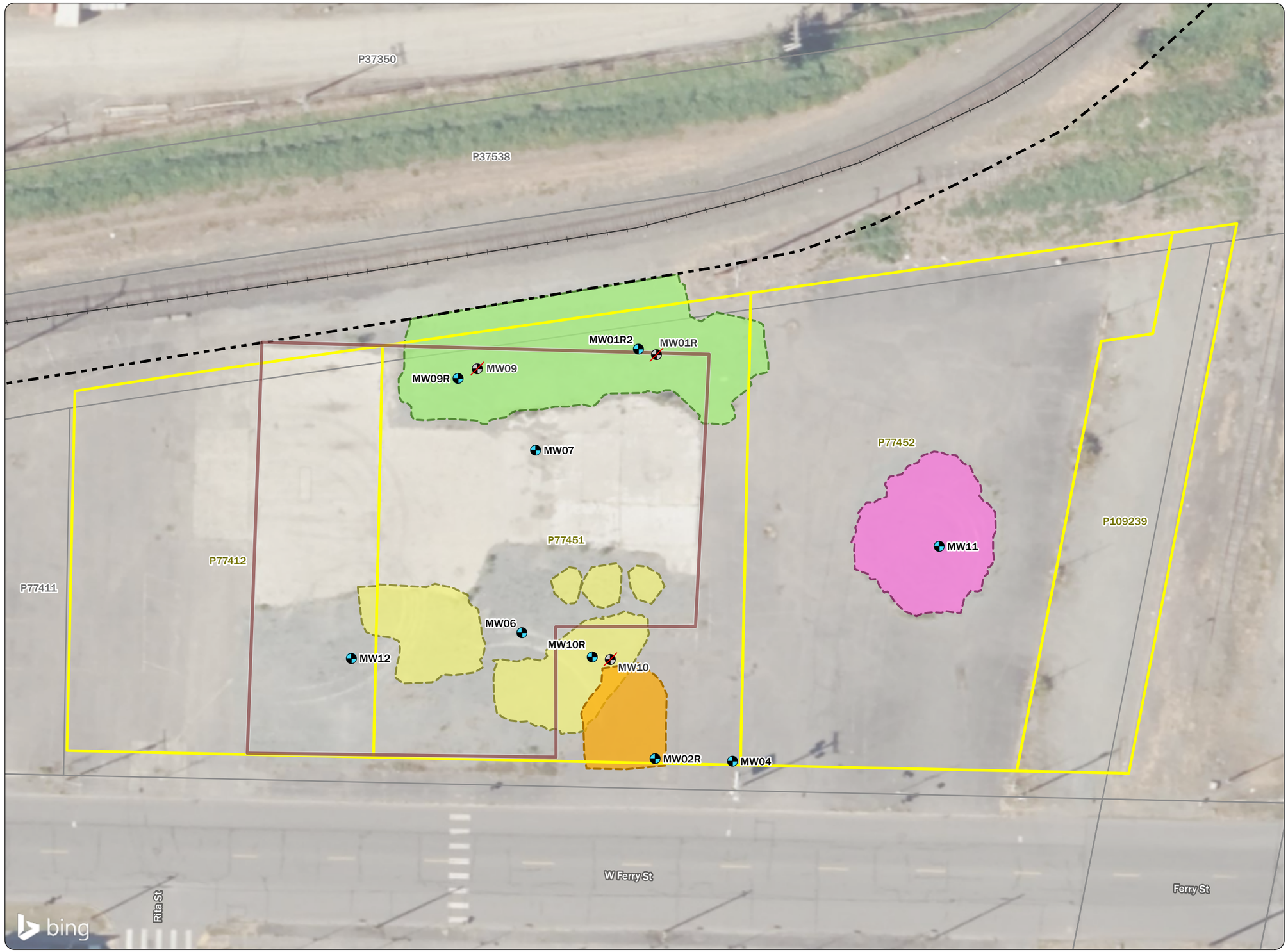

Figure 2
Compliance Monitoring Well Network

North Cascade Ford Property
Sedro-Woolley, WA

Legend

- Monitoring Well
- Decommissioned Monitoring Well
- UST Interim Action (MFA, 2016)
- AOC 1 Excavation (MFA, 2020b)
- AOC 2 Excavation (MFA, 2020b)
- AOC 3 Excavation (MFA, 2020b)
- Former Building Footprint
- Environmental Covenant Parcel (Surveyed)
- Parcel (Skagit County GIS)
- BNSF Railway
- BNSF Railway Centerline 25-foot Setback

Notes

All features are approximate.
The excavations areas are set back from the BNSF railroad centerline by 25 feet.
The surveyed environmental covenant parcel boundaries do not coincide with the adjacent parcel boundaries obtained from Skagit County; therefore, there is an overlap between the surveyed parcels and BNSF parcels.
AOC = area of concern.
BNSF = Burlington Northern Santa Fe Railway.
Environmental covenant parcel = North Cascade Ford Property.

0 30
Feet

Data Sources

Aerial photograph obtained from Microsoft Bing; parcel data obtained from Skagit County; excavation extents surveyed by Pacific Geomatic Services, Inc. in March 2020; environmental covenant parcel boundaries surveyed by Wilson Engineering, LLC.

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Print Date: 4/21/2025
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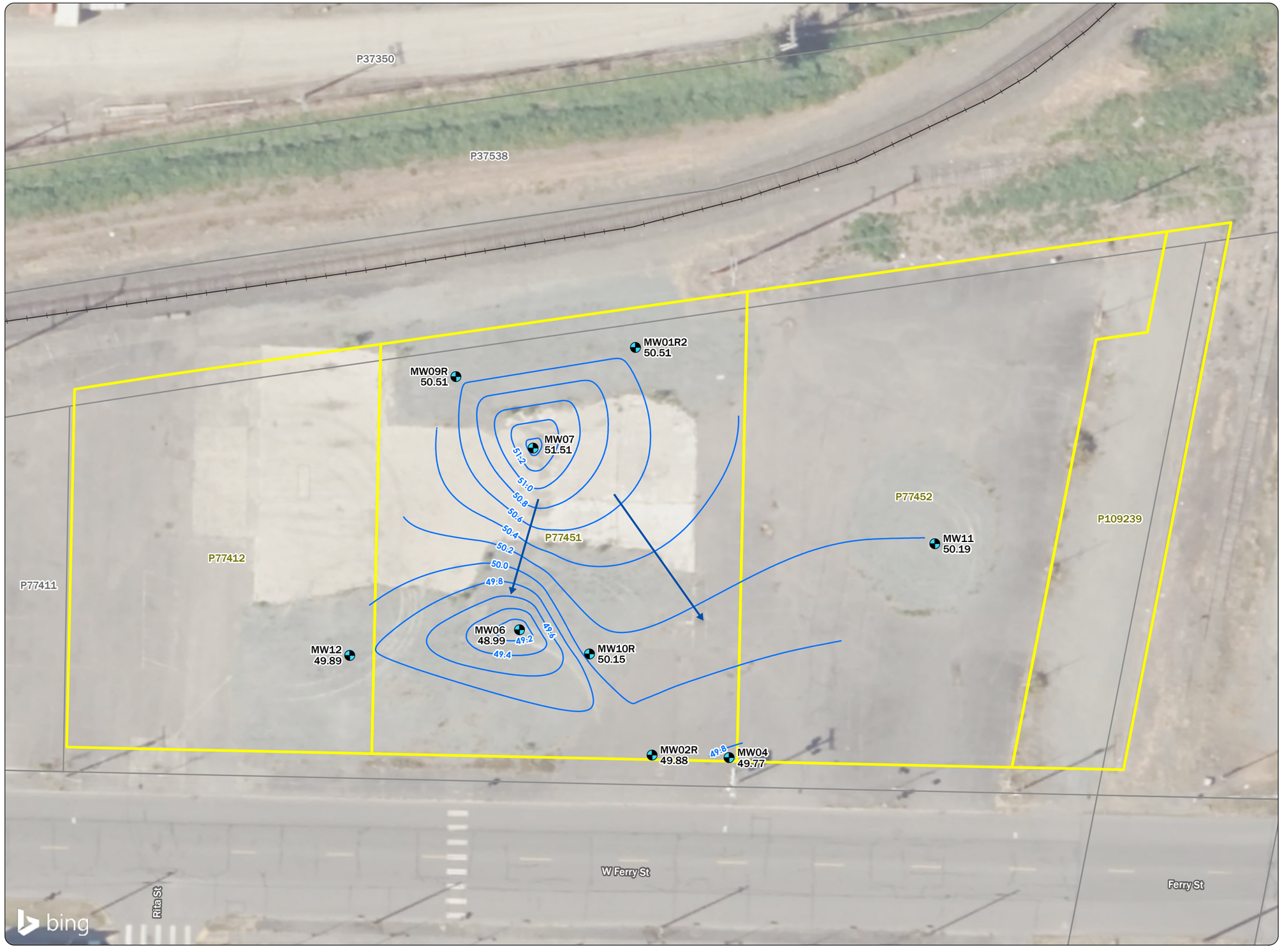
Figure 3
Groundwater Elevation Contours: March 2025

North Cascade Ford Property
Sedro-Woolley, WA



Legend

- Monitoring Well
- Groundwater Elevation Contour (feet NAVD 88)
- Approximate Groundwater Flow Direction
- BNSF Railway
- Environmental Covenant Parcel (Surveyed)
- Parcel (Skagit County GIS)

Notes

Water levels measured on March 13, 2025.
All features are approximate.
The surveyed environmental covenant parcel boundaries do not coincide with the adjacent parcel boundaries obtained from Skagit County; therefore, there is an overlap between the surveyed parcels and BNSF parcels.
BNSF = Burlington Northern Santa Fe Railway.
Environmental covenant parcel = North Cascade Ford Property.
NAVD 88 = North American Vertical Datum of 1988.

0 30
Feet

Data Sources

Aerial photograph obtained from Microsoft Bing; parcel data obtained from Skagit County; excavation extents surveyed by Pacific Geomatic Services, Inc. in March 2020; environmental covenant parcel boundaries surveyed by Wilson Engineering, LLC.

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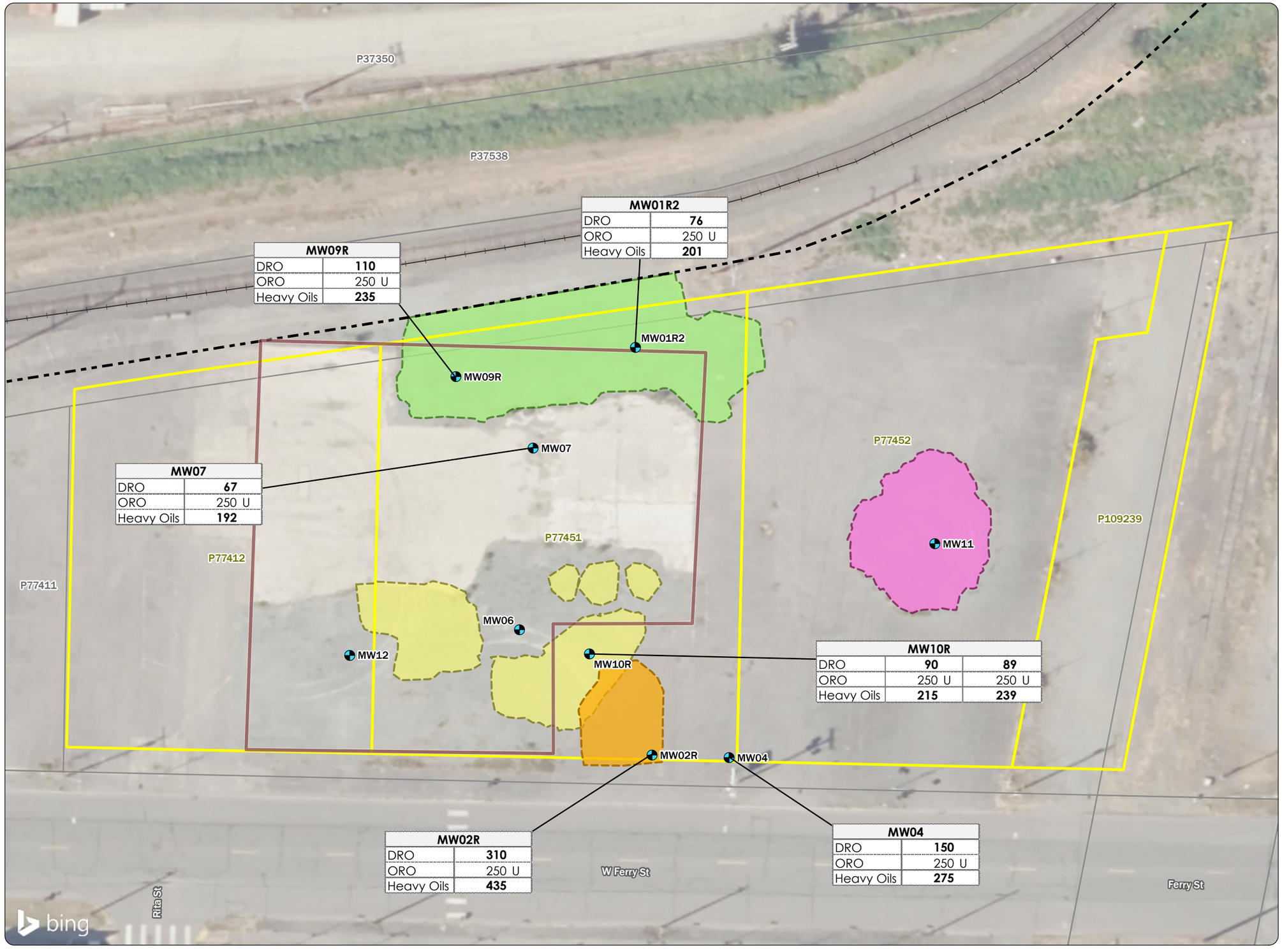

Figure 4
Groundwater Exceedances
March 2025

North Cascade Ford Property
Sedro-Woolley, WA

Legend

- Monitoring Well
- UST Interim Action (MFA, 2016)
- AOC 1 Excavation (MFA, 2020b)
- AOC 2 Excavation (MFA, 2020b)
- AOC 3 Excavation (MFA, 2020b)
- Environmental Covenant Parcel (Surveyed)
- Former Building Footprint
- Parcel (Skagit County GIS)
- BNSF Railway
- BNSF Railway Centerline 25-foot Setback

Notes
All features are approximate.
Analytical results are shown in ug/L.
All results were compared to the MTCA Method A DRO cleanup level of 500 ug/L.
Bolding indicates a detection.
The excavation areas are set back from the BNSF railroad centerline by 25 feet.
The surveyed environmental covenant parcel boundaries do not coincide with the adjacent parcel boundaries obtained from Skagit County; therefore, there is an overlap between the surveyed parcels and BNSF parcels.
BNSF = Burlington Northern Santa Fe Railway.
DRO = diesel-range organics.
Environmental covenant parcel = North Cascade Ford Property.
heavy oils = sum of DRO and ORO.
MTCA = Model Toxics Control Act.
ORO = oil-range organics.
U = result is not detected.
ug/L = micrograms per liter.
UST = underground storage tank.

0 30
Feet

Data Sources
Aerial photograph obtained from Microsoft Bing; parcel data obtained from Skagit County; excavation extents surveyed by Pacific Geomatic Services, Inc. in March 2020; environmental covenant parcel boundaries surveyed by Wilson Engineering, LLC.

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Figure 5
Diesel-Range Organics Concentrations
North Cascade Ford Property
Sedro-Woolley, Washington

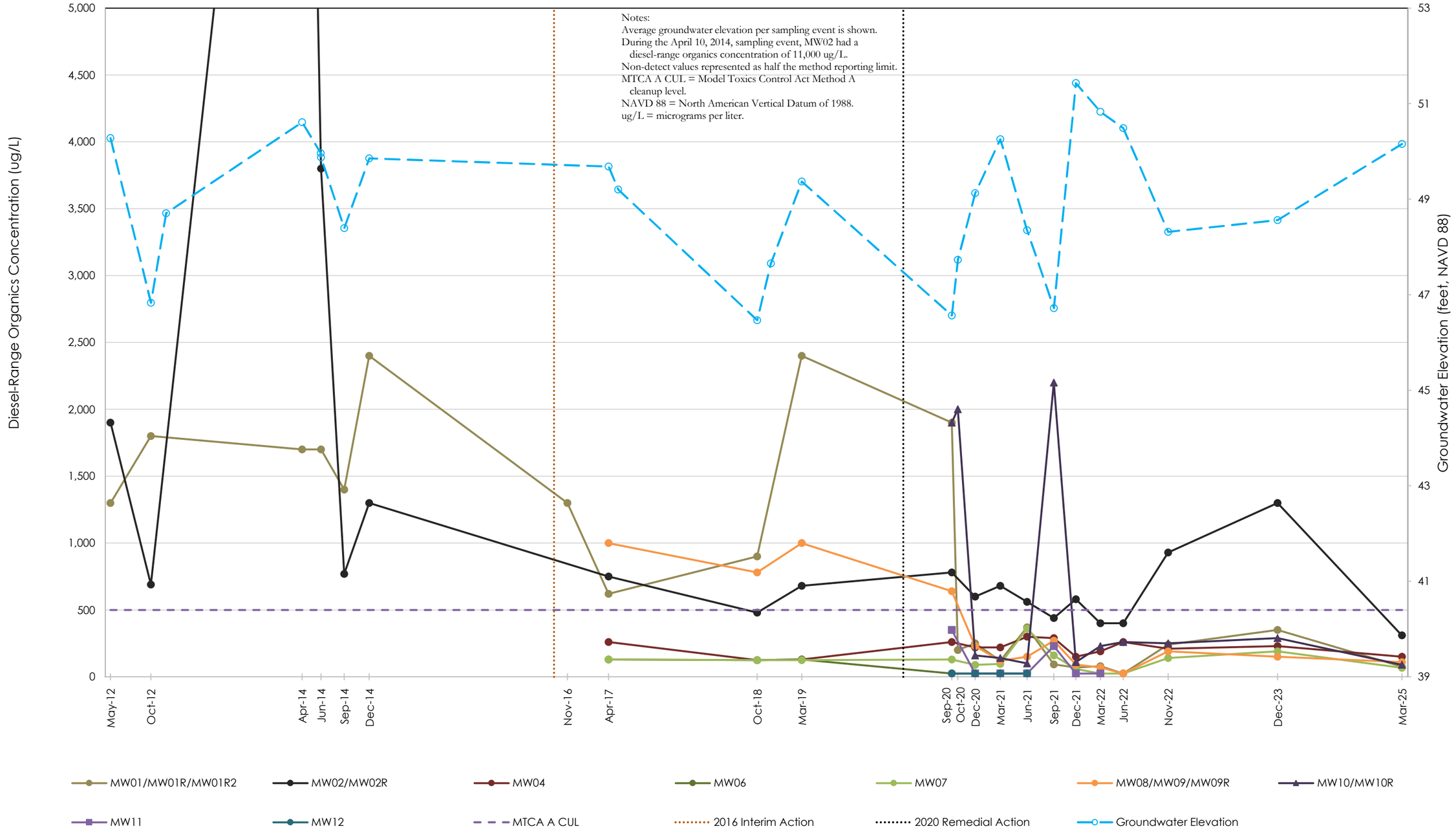

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Figure 6
Lube-Oil-Range Organics Concentrations
North Cascade Ford Property
Sedro-Woolley, Washington

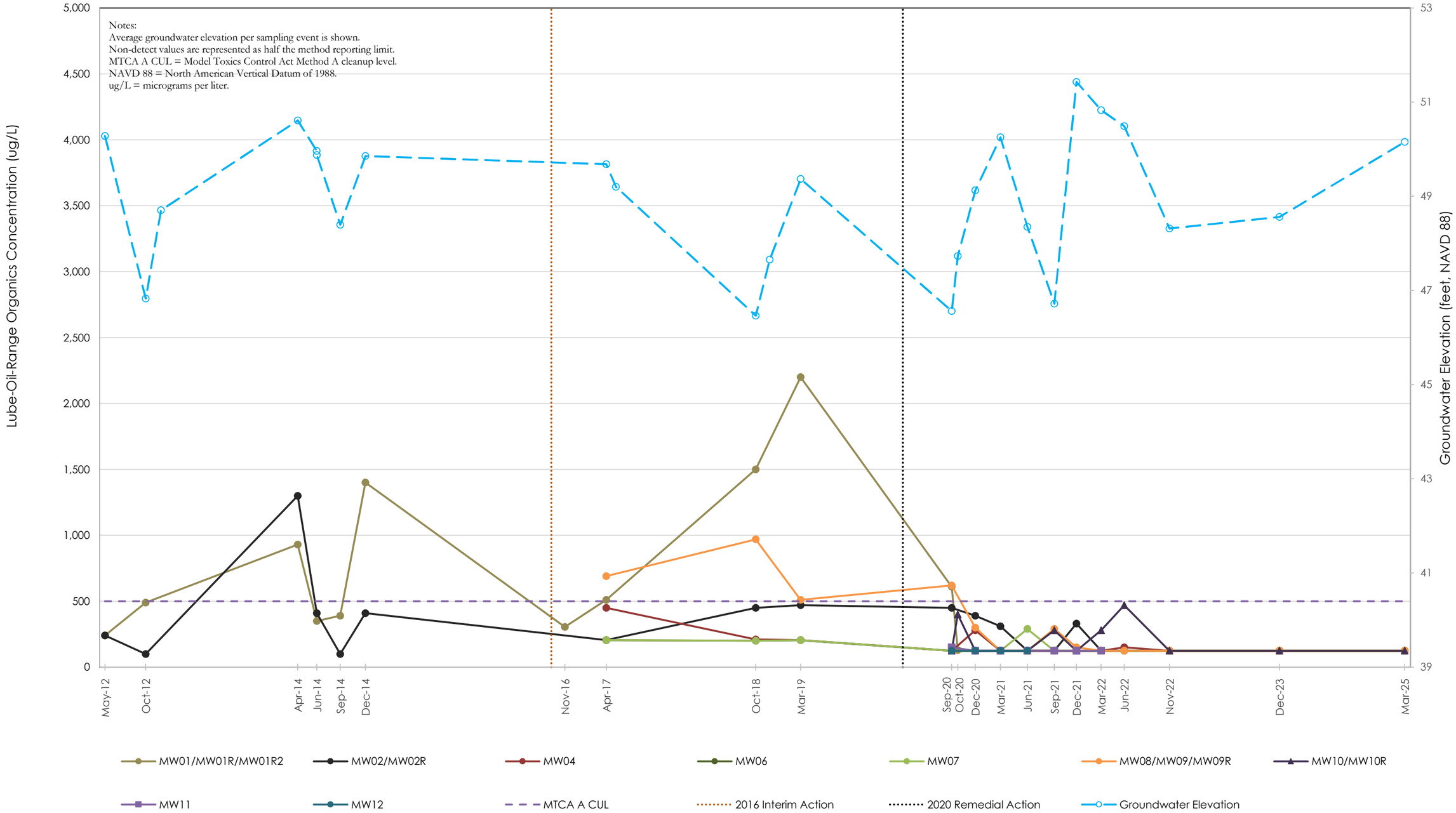

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Figure 7
Heavy Oil Concentrations
North Cascade Ford Property
Sedro-Woolley, Washington

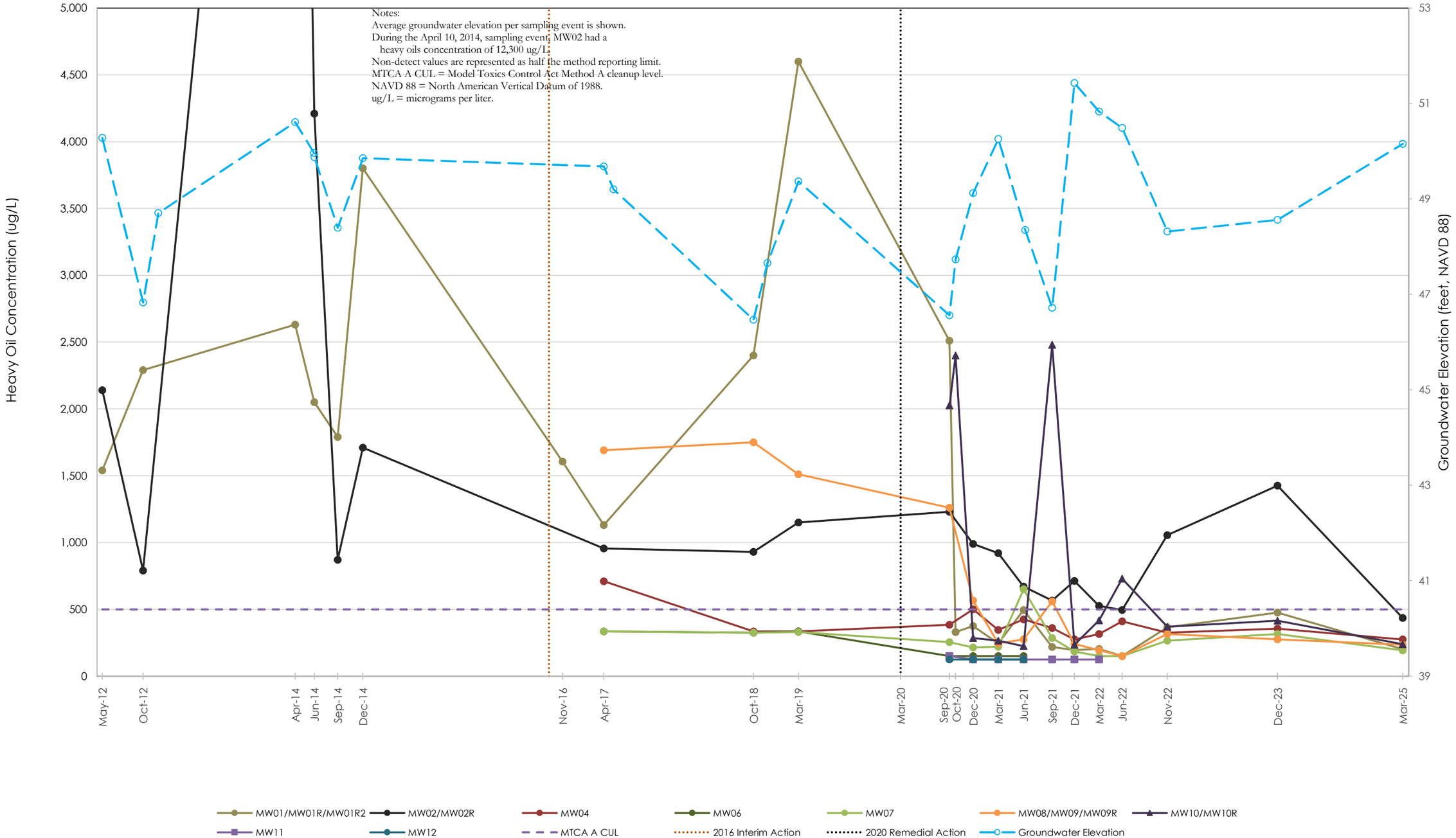

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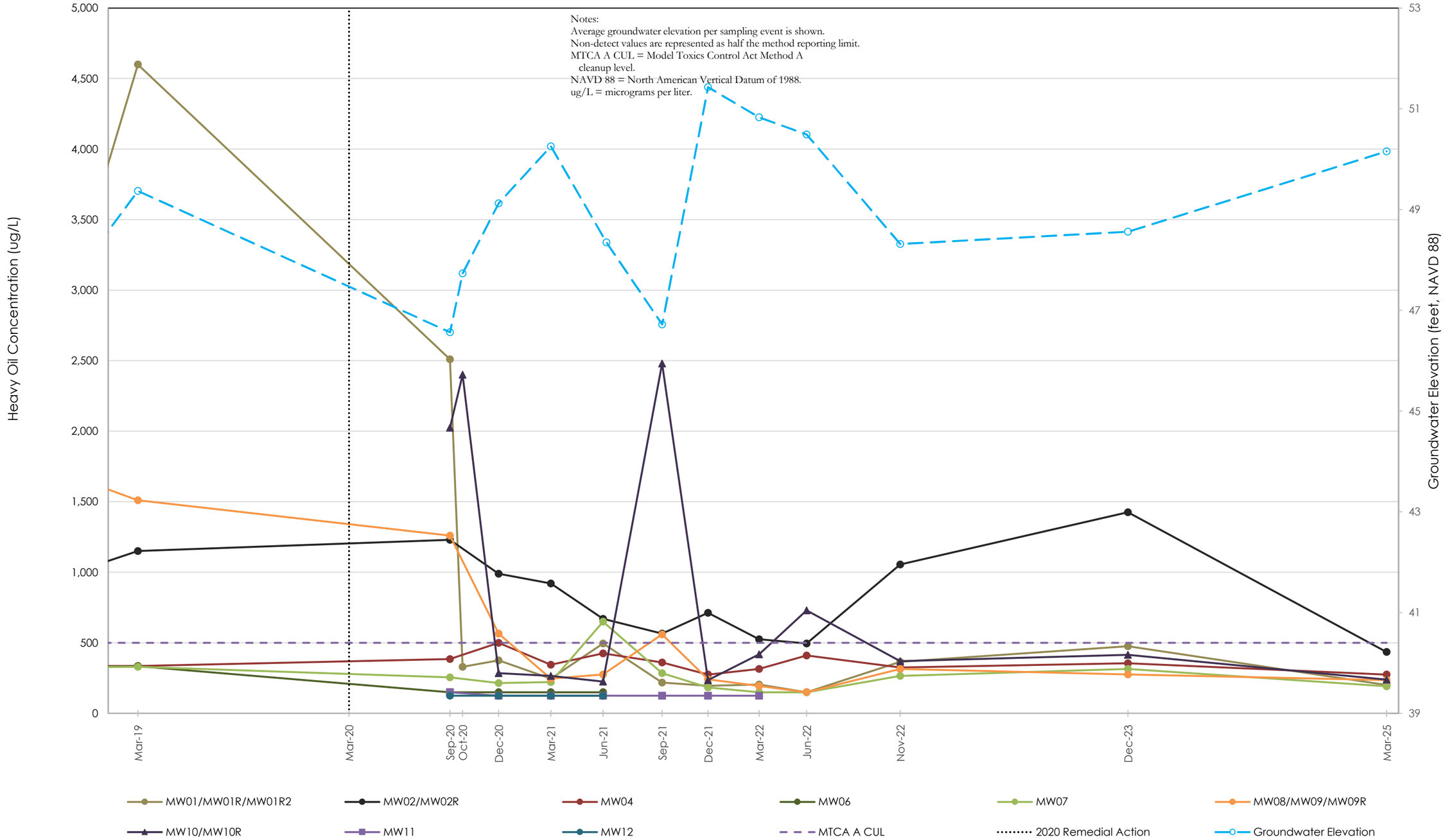
Figure 8
Heavy Oil Concentrations 2019 to 2025
North Cascade Ford Property
Sedro-Woolley, Washington



Tables

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Table 1
Historical Groundwater Analytical Results
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

AOC	Location	Sample Name	Collection Date	Collection Depth (ft bgs)[a]	Benzene	Ethylbenzene	Toluene	Xylenes[b]	Gasoline-Range Organics	Diesel-Range Organics	Lube-Oil-Range Organics	Total Naphthalenes
MTCA Method A CUL:					5	700	1,000	1,000	800	500	500	160
1	MW01	MW1-W-8.5	05/15/2012	5.61-13.44	**0.3**	0.2 U	0.2 U	0.4 U	**400**	**1,300**	**240**	**10.53**
		FIELD DUPLICATE			**0.3**	0.2 U	0.2 U	0.4 U	**380**	**1,200**	**220**	**11.36**
		MW01-GW-20121019	10/09/2012	9.87-13.44	--	--	--	--	--	**1,800**	**490**	**11.18**
		MW01	04/10/2014	NM	0.2 U	0.2 U	0.2 U	0.4 U	250 U	**1,700**	**870**	--
		MWDUP			0.2 U	0.2 U	0.2 U	0.4 U	250 U	**1,600**	**930**	--
		MW01-GW-140618	06/18/2014	6.09-13.45	--	--	--	--	--	**1,400**	**310**	--
		FD-GW-140618			--	--	--	--	--	**1,700**	**350**	--
		MW01-GW-091014	09/10/2014	7.74-13.44	--	--	--	--	--	**1,300**	**300**	--
		FD-091014			--	--	--	--	--	**1,400**	**390**	--
		MW01-GW-121014	12/10/2014	6.08-13.46	--	--	--	--	--	**2,400**	**1,400**	--
		FD-121014			--	--	--	--	--	**1,900**	**1,200**	--
		MW01-GW-112816	11/28/2016	6.12-13.43	--	--	--	--	--	**1,300**	610 U	--
		MWDUP-GW-112816			--	--	--	--	--	**1,300**	590 U	--
		MW01-GW-042617	04/26/2017	5.35-13.40	--	--	--	--	100 U	**620**	**510 J**	--
		MWDUP-GW-042617			--	--	--	--	100 U	**560**	410 U	--
		MW01-GW-101718	10/17/2018	9.70-13.40	--	--	--	--	500 U	**900**	**1,500**	--
		MW01-GW-032819	03/28/2019	6.82-13.41	--	--	--	--	**370 J**	**2,400**	**2,200**	--
	MW05	MW05-GW-042617	04/26/2017	5.76-10.60	--	--	--	--	**490**	**1,300**	**1,100**	--
		MW05-GW-032819	03/28/2019	6.93-10.63	--	--	--	--	**600 J**	**1,500**	**460**	--
	MW07	MW07-GW-042617	04/26/2017	7.85-19.74	--	--	--	--	100 U	260 U	410 U	--
		MW07-GW-101718	10/17/2018	9.25-19.74	--	--	--	--	100 U	250 U	400 U	--
		MW07-GW-032819	03/28/2019	7.95-19.74	--	--	--	--	100 U	250 U	410 U	--
	MW08	MW08-GW-042617	04/26/2017	7.38-15.80	--	--	--	--	400 U	**1,000**	**690**	--
		MW08-GW-101718	10/17/2018	10.05-15.80	--	--	--	--	100 U	**700**	**580**	--
		MWDUP-GW-101718			--	--	--	--	500 U	**780**	**970**	--
		MW08-GW-032819	03/28/2019	6.85-15.82	--	--	--	--	100 U	**950**	**460**	--
		MWDUP-GW-032819			--	--	--	--	100 U	**1,000**	**510**	--
2	MW02 (decommissioned in September 2016)	MW2-W-9	05/16/2012	6.65-13.85	0.2 U	0.2 U	0.2 U	0.4 U	250 U	**1,900**	**240**	ND
		MW02-GW-20121019	10/09/2012	9.29-13.84	--	--	--	--	--	**690**	200 U	--
		MW02	04/10/2014	6.12-13.81	--	--	--	--	--	**11,000**	**1,300**	--
		MW02-GW-140618	06/18/2014	6.98-13.80	--	--	--	--	--	**3,800**	**410**	--
		MW02-GW-091014	09/10/2014	8.37-13.84	--	--	--	--	--	**770**	200 U	--
		MW02-GW-121014	12/10/2014	7.11-13.85	--	--	--	--	--	**1,300**	**410**	--
	MW02R (replacement well for MW02)	MW02R-GW-042617	04/26/2017	6.60-14.80	--	--	--	--	--	**750**	410 U	--
		MW02R-GW-101718	10/17/2018	9.90-14.80	--	--	--	--	--	**480**	**450**	--
		MW02R-GW-032819	03/28/2019	7.60-14.79	--	--	--	--	--	**680**	**470**	--

Table 1
Historical Groundwater Analytical Results
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

AOC	Location	Sample Name	Collection Date	Collection Depth (ft bgs)[a]	Benzene	Ethylbenzene	Toluene	Xylenes[b]	Gasoline-Range Organics	Diesel-Range Organics	Lube-Oil-Range Organics	Total Naphthalenes
MTCA Method A CUL:					5	700	1,000	1,000	800	500	500	160
2	MW04	MW04-GW-042617	04/26/2017	6.39-13.60	--	--	--	--	--	**260**	**450**	--
		MW04-GW-101718	10/17/2018	10.23-13.60	--	--	--	--	--	250 U	420 U	--
		MW04-GW-032819	03/28/2019	7.40-13.58	--	--	--	--	--	260 U	410 U	--
	MW06	MW06-GW-042617	04/26/2017	7.66-19.74	--	--	--	--	--	260 U	410 U	--
		MW06-GW-101718	10/17/2018	10.6-19.74	--	--	--	--	100 U	250 U	400 U	--
		MW06-GW-032819	03/28/2019	5.73-13.88	--	--	--	--	100 U	260 U	410 U	--
3	GP51	GP51-W-11.0	11/16/2016	8.85-12.0	**15 J**	**480 J**	**6.1 J**	**1000 J**	**7,400 J**	--	--	--
	GP76	GP76-W-10.0	04/25/2017	6.0-15.0	**5.8**	**230**	10 U	**8.4**	**6,900**	**2,800 J**	420 U	**428**

Notes

Analytical results are shown in micrograms per liter (parts per billion).

Bolding indicates a detection.

Shading indicates a MTCA Method A CUL exceedance; non-detect results ("U") were not compared with screening criteria.

-- = not analyzed.

AOC = area of concern.

CUL = cleanup level.

ft bgs = feet below ground surface.

J = result is estimated.

MTCA = Model Toxics Control Act.

MW = monitoring well.

ND = not detected.

NM = water level not measured because of unanticipated presence of free product.

U = analyte not detected at or above method reporting limit.

[a]Sample collection depths are from top of water table or top of screened interval, whichever is deeper, to bottom of screened interval.

[b]Total xylenes are sum of m,p-xylene and o-xylene. When both results are non-detect, the higher reporting limit is used.

Table 2
Water Levels
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

Location	MP Elevation (feet, NAVD 88)	Measurement Date	NAPL Thickness (feet)	Depth to Water (feet bgs)	NAPL-Corrected Depth to Water (feet bgs)[a]	Groundwater Elevation (feet, NAVD 88)
MW01 (decommissioned in February 2020)	56.09	05/15/2012	--	5.61	NA	50.48
		10/09/2012	--	9.87	NA	46.22
		12/03/2012	--	6.96	NA	49.13
		04/10/2014	NM[b]	NM[b]	NA	NM[b]
		06/17/2014	NM[c]	6.01	NA	50.16
		06/18/2014	--	6.09	NA	50.00
		09/10/2014	NM[c]	7.74	NA	48.43
		12/10/2014	0.01[d]	6.09	6.08	50.09
		04/26/2017	--	5.35	NA	50.74
		05/31/2017	--	5.96	NA	50.13
		10/17/2018	0.02	9.70	9.69	46.40
		12/06/2018	NM[e]	NA[e]	NA[e]	NA[e]
		03/28/2019	NM[e]	NA[e]	NA[e]	NA[e]
MW01R (decomissioned in September 2023)	56.32	09/22/2020	--	9.94	NA	46.38
		10/14/2020	--	7.82	NA	48.50
		12/16/2020	--	5.84	NA	50.48
		03/17/2021	--	5.39	NA	50.93
		06/22/2021	--	7.27	NA	49.05
		09/27/2021	--	7.79	NA	48.53
		12/16/2021	--	4.19	NA	52.13
		03/15/2022	--	4.92	NA	51.40
		06/06/2022	--	5.20	NA	51.12
		11/16/2022	--	6.53	NA	49.79
MW01R2	56.66	12/18/2023	--	6.51	NA	50.15
		03/13/2025	--	6.15	NA	50.51

Table 2
Water Levels
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

Location	MP Elevation (feet, NAVD 88)	Measurement Date	NAPL Thickness (feet)	Depth to Water (feet bgs)	NAPL-Corrected Depth to Water (feet bgs)[(a)]	Groundwater Elevation (feet, NAVD 88)
MW02 (decommissioned in September 2016)	56.73	05/15/2012	--	6.65	NA	50.08
		10/09/2012	--	9.29	NA	47.44
		12/03/2012	--	8.45	NA	48.28
		04/10/2014	--	6.12	NA	50.61
		06/17/2014	--	6.96	NA	49.77
		06/18/2014	--	6.98	NA	49.75
		09/10/2014	--	8.37	NA	48.36
		12/10/2014	--	7.11	NA	49.62
MW02R	56.59	04/26/2017	--	6.60	NA	49.99
		05/31/2017	--	7.07	NA	49.52
		10/17/2018	--	9.90	NA	46.69
		12/06/2018	--	8.80	NA	47.79
		03/28/2019	--	7.60	NA	48.99
		09/22/2020	--	9.28	NA	47.31
		10/14/2020	--	9.41	NA	47.18
		12/16/2020	--	7.79	NA	48.80
		03/17/2021	--	6.23	NA	50.36
		06/22/2021	--	8.12	NA	48.47
		09/27/2021	--	10.04	NA	46.55
		12/16/2021	--	5.31	NA	51.28
		03/15/2022	--	5.88	NA	50.71
		06/06/2022	--	6.24	NA	50.35
		11/16/2022	--	8.74	NA	47.85
		12/18/2023	--	8.57	NA	48.02
		03/13/2025	--	6.71	NA	49.88

Table 2
Water Levels
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

Location	MP Elevation (feet, NAVD 88)	Measurement Date	NAPL Thickness (feet)	Depth to Water (feet bgs)	NAPL-Corrected Depth to Water (feet bgs)[(a)]	Groundwater Elevation (feet, NAVD 88)
MW03	55.08	05/15/2012	--	5.40	NA	49.68
		10/09/2012	--	8.11	NA	46.97
		12/03/2012	--	5.28	NA	49.80
		04/10/2014	--	5.00	NA	50.08
		06/17/2014	--	5.66	NA	49.42
		06/18/2014	--	5.87	NA	49.21
		09/10/2014	--	6.94	NA	48.14
		12/10/2014	--	5.10	NA	49.98
		05/31/2017	--	5.75	NA	49.33
		10/17/2018	--	7.72	NA	47.36
		12/06/2018	--	5.92	NA	49.16
		03/28/2019	--	5.73	NA	49.35
MW04	56.32	04/26/2017	--	6.39	NA	49.93
		05/31/2017	--	6.88	NA	49.44
		10/17/2018	--	10.23	NA	46.09
		12/06/2018	--	8.62	NA	47.70
		03/28/2019	--	7.40	NA	48.92
		09/22/2020	--	9.06	NA	47.26
		12/16/2020	--	7.71	NA	48.61
		03/17/2021	--	6.04	NA	50.28
		06/22/2021	--	7.96	NA	48.36
		09/27/2021	--	10.31	NA	46.01
		12/16/2021	--	5.12	NA	51.20
		03/15/2022	--	5.69	NA	50.63
		06/06/2022	--	6.35	NA	49.97
		11/16/2022	--	8.65	NA	47.67

Table 2
Water Levels
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

Location	MP Elevation (feet, NAVD 88)	Measurement Date	NAPL Thickness (feet)	Depth to Water (feet bgs)	NAPL-Corrected Depth to Water (feet bgs)[a]	Groundwater Elevation (feet, NAVD 88)
MW04 (continued)	56.32	12/18/2023	--	8.57	NA	47.75
		03/13/2025	--	6.55	NA	49.77
MW05 (decommissioned in February 2020)	56.25	04/26/2017	--	5.76	NA	50.49
		05/31/2017	--	6.35	NA	49.90
		10/17/2018	--	NA[f]	NA[f]	NA[f]
		12/06/2018	--	8.05	NA	48.20
		03/28/2019	--	6.93	NA	49.32
MW06	56.58	04/26/2017	--	7.66	NA	48.92
		05/31/2017	--	8.06	NA	48.52
		10/17/2018	--	10.60	NA	45.98
		12/06/2018	--	9.10	NA	47.48
		03/28/2019	--	5.73	NA	50.85
		09/22/2020	--	10.84	NA	45.74
		12/16/2020	--	8.25	NA	48.33
		03/17/2021	--	7.11	NA	49.47
		06/22/2021	--	8.72	NA	47.86
		09/27/2021	--	10.83	NA	45.75
		12/16/2021	--	5.60	NA	50.98
		03/15/2022	--	6.12	NA	50.46
		06/06/2022	--	6.40	NA	50.18
		11/16/2022	--	8.56	NA	48.02
		12/18/2023	--	8.66	NA	47.92
		03/13/2025	--	7.59	NA	48.99

Table 2
Water Levels
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

Location	MP Elevation (feet, NAVD 88)	Measurement Date	NAPL Thickness (feet)	Depth to Water (feet bgs)	NAPL-Corrected Depth to Water (feet bgs)[a]	Groundwater Elevation (feet, NAVD 88)
MW07	56.46	04/26/2017	--	7.85	NA	48.61
		05/31/2017	--	8.02	NA	48.44
		10/17/2018	--	9.25	NA	47.21
		12/06/2018	--	9.15	NA	47.31
		03/28/2019	--	7.95	NA	48.51
	NA[g]	09/22/2020	--	10.42[g]	NA[g]	NA[g]
	56.30	12/16/2020	--	8.24	NA	48.06
		03/17/2021	--	6.92	NA	49.38
		06/22/2021	--	8.80	NA	47.50
		09/27/2021	--	10.21	NA	46.09
		12/16/2021	--	5.17	NA	51.13
		03/05/2022	--	4.51	NA	51.79
		06/06/2022	--	5.13	NA	51.17
		11/16/2022	--	8.25	NA	48.05
		12/18/2023	--	8.62	NA	47.68
		03/13/2025	--	4.79	NA	51.51
MW08 (decommissioned in February 2020)	56.48	04/26/2017	--	7.38	NA	49.10
		05/31/2017	--	8.01	NA	48.47
		10/17/2018	--	10.05	NA	46.43
		12/06/2018	--	9.02	NA	47.46
		03/28/2019	--	6.85	NA	49.63

Table 2
Water Levels
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

Location	MP Elevation (feet, NAVD 88)	Measurement Date	NAPL Thickness (feet)	Depth to Water (feet bgs)	NAPL-Corrected Depth to Water (feet bgs)[(a)]	Groundwater Elevation (feet, NAVD 88)
MW09 (decomissioned in September 2023)	56.66	09/22/2020	--	9.26	NA	47.40
		10/14/2020	--	8.46	NA	48.20
		12/16/2020	--	6.17	NA	50.49
		03/17/2021	--	5.70	NA	50.96
		06/22/2021	--	7.57	NA	49.09
		09/27/2021	--	8.74	NA	47.92
		12/16/2021	--	4.51	NA	52.15
		03/15/2022	--	5.23	NA	51.43
		06/06/2022	--	5.53	NA	51.13
		11/16/2022	--	6.88	NA	49.78
MW09R	56.60	12/18/2023	--	6.47	NA	50.13
		03/13/2025	--	6.09	NA	50.51
MW10 (decomissioned in September 2023)	56.26	09/22/2020	--	9.71	NA	46.55
		10/14/2020	--	9.21	NA	47.05
		12/16/2020	--	7.13	NA	49.13
		03/17/2021	--	5.80	NA	50.46
		06/22/2021	--	7.62	NA	48.64
		09/27/2021	--	9.42	NA	46.84
		12/16/2021	--	4.78	NA	51.48
		03/15/2022	--	5.44	NA	50.82
		06/06/2022	--	5.99	NA	50.27
		11/16/2022	--	8.01	NA	48.25

Table 2
Water Levels
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

Location	MP Elevation (feet, NAVD 88)	Measurement Date	NAPL Thickness (feet)	Depth to Water (feet bgs)	NAPL-Corrected Depth to Water (feet bgs)[(a)]	Groundwater Elevation (feet, NAVD 88)
MW10R	55.75	12/18/2023	--	7.21	NA	48.54
		03/13/2025	--	5.60	NA	50.15
MW11	56.2	09/22/2020	--	10.48	NA	45.72
		12/16/2020	--	6.51	NA	49.69
		03/17/2021	--	5.46	NA	50.74
		06/22/2021	--	7.72	NA	48.48
		09/27/2021	--	9.21	NA	46.99
		12/16/2021	--	4.28	NA	51.92
		03/15/2022	--	5.03	NA	51.17
		06/06/2022	--	5.45	NA	50.75
		11/16/2022	--	7.67	NA	48.53
		12/18/2023	--	7.26	NA	48.94
		03/13/2025	--	6.01	NA	50.19
MW12	56.39	09/22/2020	--	10.24	NA	46.15
		12/16/2020	--	7.85	NA	48.54
		03/17/2021	--	6.67	NA	49.72
		06/22/2021	--	8.69	NA	47.70
		09/27/2021	--	10.59	NA	45.80
		12/16/2021	--	5.79	NA	50.60
		03/15/2022	--	6.33	NA	50.06
		06/06/2022	--	6.93	NA	49.46
		11/16/2022	--	9.03	NA	47.36
		12/18/2023	--	8.47	NA	47.92
		03/13/2025	--	6.50	NA	49.89

Table 2
Water Levels
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

Notes

-- = NAPL not observed.

bgs = below ground surface.

MP = measuring point.

MW = monitoring well.

NA = not applicable.

NAPL = nonaqueous-phase liquid.

NAVD 88 = North American Vertical Datum of 1988.

NM = not measured.

[a]Water level corrected for presence of NAPL, using assumed product density of 0.8 grams per cubic centimeter.

[b]NAPL was observed, but interface probe was not available to measure NAPL thickness and water level.

[c]NAPL was observed on probe and tubing, but measurable and extractable quantity was not present.

[d]NAPL thickness was measured, but extractable quantity was not present.

[e]NAPL was present, coating entire probe tip and tubing; coated probe tip prevented measurement of thickness or water level.

[f]Water level may not be representative of groundwater elevation because screened interval was above low water table.

[g]Well monument was compressed during implementation of remedial action, and casing had to be cut down to properly secure monument. Water level measurement not collected. New well monument installed on 10/01/2020.

Table 3
Groundwater Analytical Results—Compliance Monitoring
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

AOC	Location	Collection Date	Benzene	Ethyl-benzene	Toluene	Total Xylenes	GRO	DRO	ORO	Heavy Oils[a]	1,4-Dichloro-benzene	Total Naphth.[b]
		Units:	ug/L									
		MTCA Method A CUL:[1]	5	700	1,000	1,000	1,000[c]	500	500	500	NV	160
1	MW01R	09/22/2020	1 U	1 U	1 U	**3.7**	**160**	**1,900**	**610**	**2,510**	--	--
		10/14/2020	20 U	20 U	20 U	60 U	100 U	**200**	260 U	**330**	--	20 U
		12/16/2020	1 U	1 U	1 U	3 U	100 U	**250**	250 U	**375**	--	--
		03/17/2021	1 U	1 U	1 U	3 U	100 U	**120**	250 U	**245**	--	--
		06/22/2021	1 U	1 U	1 U	3 U	100 U	**370**	250 U	**495**	--	--
		09/27/2021	--	--	--	--	--	**93**	250 U	**218**	--	--
		12/16/2021	--	--	--	--	--	**70**	250 U	**195**	--	--
		03/15/2022	--	--	--	--	--	**79**	250 U	**204**	--	--
		06/06/2022	--	--	--	--	--	50 U	250 U	250 U	--	--
		11/16/2022	--	--	--	--	--	**240**	250 U	**365**	--	--
	MW01R2	12/18/2023	--	--	--	--	--	**350**	250 U	**475**	--	--
		03/13/2025	--	--	--	--	--	**76**	250 U	**201**	--	--
	MW07	09/22/2020	1 U	1 U	1 U	3 U	100 U	**130**	250 U	**255**	--	--
		12/16/2020	1 U	1 U	1 U	3 U	100 U	**89**	250 U	**214**	--	--
		03/17/2021	1 U	1 U	1 U	3 U	100 U	**96**	250 U	**221**	--	--
		06/22/2021	1 U	1 U	1 U	3 U	100 U	**360**	**290**	**650**	--	--
		09/27/2021	--	--	--	--	--	**160**	250 U	**285**	--	--
		12/16/2021	--	--	--	--	--	**59**	250 U	**184**	--	--
		03/15/2022	--	--	--	--	--	50 U	250 U	250 U	--	--
		06/06/2022	--	--	--	--	--	50 U	250 U	250 U	--	--
		11/16/2022	--	--	--	--	--	**140**	250 U	**265**	--	--
		12/18/2023	--	--	--	--	--	**190**	250 U	**315**	--	--
		03/13/2025	--	--	--	--	--	**67**	250 U	**192**	--	--

Table 3
Groundwater Analytical Results—Compliance Monitoring
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

AOC	Location	Collection Date	Benzene	Ethyl-benzene	Toluene	Total Xylenes	GRO	DRO	ORO	Heavy Oils[a]	1,4-Dichloro-benzene	Total Naphth.[b]
		Units:	ug/L									
		MTCA Method A CUL:[1]	5	700	1,000	1,000	1,000[c]	500	500	500	NV	160
1	MW09	09/22/2020	1 U	1 U	1 U	3 U	100 U	**640**	**620**	**1,260**	--	--
		12/16/2020	1 U	1 U	1 U	3 U	100 U	**230**	**300**	**530**	--	--
		12/16/2020	1 U	1 U	1 U	3 U	100 U	**210**	**390**	**600**	--	--
		03/17/2021	1 U	1 U	1 U	3 U	100 U	**120**	250 U	**245**	--	--
		06/22/2021	1 U	1 U	1 U	3 U	100 U	**150**	250 U	**275**	--	--
		09/27/2021	--	--	--	--	--	**270**	**290**	**560**	--	--
		12/16/2021	--	--	--	--	--	**91**	300 U	**241**	1 U	--
		03/15/2022	--	--	--	--	--	**69**	250 U	**194**	--	--
		06/06/2022	--	--	--	--	--	50 U	250 U	250 U	--	--
		11/16/2022	--	--	--	--	--	**190**	250 U	**315**	--	--
	MW09R	12/18/2023	--	--	--	--	--	**150**	250 U	**275**	--	--
		03/13/2025	--	--	--	--	--	**110**	250 U	**235**	--	--
2	MW02R	09/22/2020	1 U	1 U	1 U	3 U	100 U	**780**	**450**	**1,230**	--	--
		12/16/2020	1 U	1 U	1 U	3 U	100 U	**600**	**390**	**990**	--	--
		03/17/2021	1 U	1 U	1 U	3 U	100 U	**680**	**310**	**990**	--	--
		03/17/2021	1 U	1 U	1 U	3 U	100 U	**580**	**270**	**850**	--	--
		06/22/2021	1 U	1 U	1 U	3 U	100 U	**560**	250 U	**685**	--	--
		06/22/2021	1 U	1 U	1 U	3 U	100 U	**530**	250 U	**655**	--	--
		09/27/2021	--	--	--	--	--	**440**	250 U	**565**	--	--
		12/16/2021	--	--	--	--	--	**580**	**330**	**910**	--	--
		12/16/2021	--	--	--	--	--	**390**	250 U	**515**	--	--
		03/15/2022	--	--	--	--	--	**400**	250 U	**525**	--	--
		06/06/2022	--	--	--	--	--	**340**	250 U	**465**	--	--
		06/06/2022	--	--	--	--	--	**400**	250 U	**525**	--	--
		11/16/2022	--	--	--	--	--	**930**	250 U	**1,055**	--	--
		12/18/2023	--	--	--	--	--	**1,300**	250 U	**1,425**	--	--
		03/13/2025	--	--	--	--	--	**310**	250 U	**435**	--	--

Table 3
Groundwater Analytical Results—Compliance Monitoring
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

AOC	Location	Collection Date	Benzene	Ethyl-benzene	Toluene	Total Xylenes	GRO	DRO	ORO	Heavy Oils[a]	1,4-Dichloro-benzene	Total Naphth.[b]
		Units:	ug/L									
		MTCA Method A CUL:[1]	5	700	1,000	1,000	1,000[c]	500	500	500	NV	160
2	MW04	09/22/2020	1 U	1 U	1 U	3 U	100 U	**260**	250 U	**385**	--	--
		12/16/2020	1 U	1 U	1 U	3 U	100 U	**220**	**280**	**500**	--	--
		03/17/2021	1 U	1 U	1 U	3 U	100 U	**220**	250 U	**345**	--	--
		06/22/2021	1 U	1 U	1 U	3 U	100 U	**300**	250 U	**425**	--	--
		09/27/2021	--	--	--	--	--	**290**	250 U	**415**	--	--
		09/27/2021	--	--	--	--	--	**180**	250 U	**305**	--	--
		12/16/2021	--	--	--	--	--	**150**	250 U	**275**	--	--
		03/15/2022	--	--	--	--	--	**190**	250 U	**315**	--	--
		06/06/2022	--	--	--	--	--	**260**	300 U	**410**	--	--
		11/16/2022	--	--	--	--	--	**210**	250 U	**335**	--	--
		12/18/2023	--	--	--	--	--	**230**	250 U	**355**	--	--
		03/13/2025	--	--	--	--	--	**150**	250 U	**275**	--	--
	MW06	09/22/2020	1 U	1 U	1 U	3 U	100 U	50 U	250 U	250 U	--	--
		12/16/2020	1 U	1 U	1 U	3 U	100 U	50 U	250 U	250 U	--	--
		03/17/2021	1 U	1 U	1 U	3 U	100 U	50 U	250 U	250 U	--	--
		06/22/2021	1 U	1 U	1 U	3 U	100 U	50 U	250 U	250 U	--	--
	MW10	09/22/2020	1 U	1 U	1 U	3 U	**370**	**1,900**	250 U	**2,025**	--	--
		10/14/2020	20 U	20 U	20 U	60 U	**550**	**2,000**	**400**	**2,400**	--	**65.1**
		12/16/2020	1 U	1 U	1 U	3 U	100 U	**160**	250 U	**285**	--	--
		03/17/2021	1 U	1 U	1 U	3 U	100 U	**140**	250 U	**265**	--	--
		06/22/2021	1 U	1 U	1 U	3 U	100 U	**100**	250 U	**225**	--	--
		09/27/2021	--	--	--	--	--	**2,200**	**280**	**2,480**	--	--
		12/16/2021	--	--	--	--	--	**110**	250 U	**235**	--	0.4 U
		03/15/2022	--	--	--	--	--	**200**	250 U	**325**	--	--
		03/15/2022	--	--	--	--	--	**230**	**280**	**510**	--	--
		06/06/2022	--	--	--	--	--	**260**	**470**	**730**	--	--
		11/16/2022	--	--	--	--	--	**240**	250 U	**365**	--	--
		11/16/2022	--	--	--	--	--	**250**	250 U	**375**	--	--

Table 3
Groundwater Analytical Results—Compliance Monitoring
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

AOC	Location	Collection Date	Benzene	Ethyl-benzene	Toluene	Total Xylenes	GRO	DRO	ORO	Heavy Oils[a]	1,4-Dichloro-benzene	Total Naphth.[b]
		Units:	ug/L									
		MTCA Method A CUL:[1]	5	700	1,000	1,000	1,000[c]	500	500	500	NV	160
2	MW10R	12/18/2023	--	--	--	--	--	**290**	250 U	**415**	--	--
		12/18/2023	--	--	--	--	--	**290**	250 U	**415**	--	--
		03/13/2025	--	--	--	--	--	**90**	250 U	**215**	--	--
		03/13/2025	--	--	--	--	--	**89**	300 U	**239**	--	--
	MW12	09/22/2020	1 U	1 U	1 U	3 U	100 U	50 U	250 U	250 U	--	--
		12/16/2020	1 U	1 U	1 U	3 U	100 U	50 U	250 U	250 U	--	--
		03/17/2021	1 U	1 U	1 U	3 U	100 U	50 U	250 U	250 U	--	--
		06/22/2021	1 U	1 U	1 U	3 U	100 U	50 U	250 U	250 U	--	--
3	MW11	09/22/2020	1 U	**30**	1 U	**16**	**390**	**350**	300 U	**500**	--	**18.8**
		09/22/2020	1 U	**30**	1 U	**17**	**380**	**200**	250 U	**325**	--	**21.7**
		12/16/2020	1 U	1 U	1 U	3 U	100 U	50 U	250 U	250 U	--	0.4 U
		03/17/2021	1 U	1 U	1 U	3 U	100 U	50 U	250 U	250 U	--	0.4 U
		06/22/2021	1 U	1 U	1 U	3 U	100 U	50 U	250 U	250 U	--	0.4 U
		09/27/2021	--	--	--	--	--	**230**	250 U	**355**	--	--
		12/16/2021	--	--	--	--	--	50 U	250 U	250 U	--	--
		03/16/2022	--	--	--	--	--	50 U	250 U	250 U	--	--

Table 3
Groundwater Analytical Results—Compliance Monitoring
VSF Properties, LLC, North Cascade Ford Property
Sedro-Woolley, Washington

Notes

Detected values are shown in bold font.

Shading indicates a MTCA Method A CUL exceedance; non-detect results (U) were not compared with screening criteria.

-- = not analyzed.

AOC = area of concern.

CUL = cleanup level.

DRO = diesel-range organics.

GRO = gasoline-range organics.

MTCA = Model Toxics Control Act.

Naphth. = naphthalenes.

NV = no value.

ORO = lube-oil-range organics.

U = result is non-detect at the method reporting limit.

ug/L = micrograms per liter (parts per billion).

[a]Heavy oils are the sum of DRO and ORO. When results are non-detect, half the reporting limit is used. When all results are non-detect, the highest reporting limit is shown.

[b]Total naphthalenes are the sum of 1-methylnaphthalene, 2-methylnaphthalene, and naphthalene. Where 1- and 2-methylnaphthalene are not analyzed, total naphthalene is represented by the naphthalene result. When all results are non-detect, the highest reporting limit is shown.

[c]MTCA Method A CUL with no detectable benzene.

Reference

[1]Ecology. 2025. *Cleanup Levels and Risk Calculation (CLARC) table.* Washington State Department of Ecology, Toxics Cleanup Program. January.

Attachment A

Water Field Sampling Data Sheets

MAUL FOSTER ALONGI

Groundwater Field Sampling Data Sheet

MAUL FOSTER ALONGI

Project Information

Project No.	Client Name	Project Name	Sampling Event	Sampler(s)
M0747.01.014	VSF Properties	North Cascade Ford	March 2025	B. Murphy, K. Klass

Well Information

Location ID	Well Type	Monument Type	Depth Measuring Point	Well Diameter (in)	Screen Interval (ft)	Sample Depth (ft)
MW01R2	Monitoring	Flush-mount	Top of Casing	2.0	5-15	10.5

Hydrology/Level Measurements

Date	Time	Depth to Bottom (ft)	Depth to Product (ft)	Depth to Water (ft)	Product Thickness (ft)	Water Column (ft)	Well Casing Volume (gal)
		DTB	*DTP*	*DTW*	*DTW - DTP*	*DTB - DTW*	*(gal/ft x water column)*
03/13/2025	9:54	14.68		6.15		8.53	1.39

0.75" = 0.023 gal/ft
1" = 0.041 gal/ft
1.5" = 0.092 gal/ft
2" = 0.163 gal/ft
3" = 0.367 gal/ft
4" = 0.653 gal/ft
6" = 1.469 gal/ft
8" = 2.611 gal/ft

Water Quality Data

Purge Method: Peristaltic Pump

Purge/Sampling Methods: peristaltic pump, submersible pump, vacuum pump, inertia pump, dedicated pump, disposable bailer, bladder pump, other

Time	Cumulative Purge Volume	Flowrate	Water Level	pH	Temperature	Conductivity	Dissolved Oxygen	ORP	Turbidity
	gal	*L/min*	*ft*	*SU*	*degrees C*	*uS/cm*	*mg/L*	*mV*	*NTU*
Purge Start Time 10:07			*ideally < 0.3 ft drawdown*	*± 0.1*	*± 3%*	*± 3%*	*± 10% if > 0.5*	*± 10*	*< 5 or ± 10% if > 5*
10:38	1.5	0.22	6.15	7.23	8.2	449.3	3.36	162.3	2.34
10:41	1.7	0.22	6.15	7.25	8.2	448.4	3.35	161.2	2.11
10:44	1.8	0.22	6.15	7.28	8.2	447.7	3.41	160.0	1.31
10:47	2.0	0.22	6.15	7.29	8.2	445.7	3.43	158.9	1.07
10:50	2.2	0.22	6.15	7.31	8.1	444.0	3.40	157.6	1.05

Last row of water quality data are considered final field parameters unless otherwise noted.

Water Quality Observations *(clarity, tint, odor, sheen, etc.)*: Clear; colorless; no odor; no sheen.

General Comments

Sample Information

Sampling Method	Peristaltic Pump		
Sample Name	MW01R2-GW-031325		
Sample Date	03/13/2025	Sample Time	10:50
Container Type	**Preservative**	**Filtered (Y/N)**	**No. Containers**
Amber glass	None	N	1
		Total No. Containers:	1

Groundwater Field Sampling Data Sheet

MAUL FOSTER ALONGI

Project Information

Project No.	Client Name	Project Name	Sampling Event	Sampler(s)
M0747.01.014	VSF Properties	North Cascade Ford	March 2025	B. Murphy, K. Klass

Well Information

Location ID	Well Type	Monument Type	Depth Measuring Point	Well Diameter (in)	Screen Interval (ft)	Sample Depth (ft)
MW02R	Monitoring	Flush-mount	Top of Casing	2.0	5-15	10.5

Hydrology/Level Measurements

Date	Time	Depth to Bottom (ft)	Depth to Product (ft)	Depth to Water (ft)	Product Thickness (ft)	Water Column (ft)	Well Casing Volume (gal)
		DTB	*DTP*	*DTW*	*DTW - DTP*	*DTB - DTW*	*(gal/ft x water column)*
03/13/2025	12:55	14.79		6.66		8.13	1.33

0.75" = 0.023 gal/ft
1" = 0.041 gal/ft
1.5" = 0.092 gal/ft
2" = 0.163 gal/ft
3" = 0.367 gal/ft
4" = 0.653 gal/ft
6" = 1.469 gal/ft
8" = 2.611 gal/ft

Water Quality Data

Purge Method	Peristaltic Pump	*Purge/Sampling Methods: peristaltic pump, submersible pump, vacuum pump, inertia pump, dedicated pump, disposable bailer, bladder pump, other*						
Purge Start Time	13:14	*ideally < 0.3 ft drawdown*	*± 0.1*	*± 3%*	*± 3%*	*± 10% if > 0.5*	*± 10*	*< 5 or ± 10% if > 5*

Time	Cumulative Purge Volume	Flowrate	Water Level	pH	Temperature	Conductivity	Dissolved Oxygen	ORP	Turbidity
	gal	*L/min*	*ft*	*SU*	*degrees C*	*uS/cm*	*mg/L*	*mV*	*NTU*
13:44	1.4	0.19	6.79	6.73	8.9	527.8	0.96	201.6	17.7
13:47	1.6	0.19	6.80	6.75	9.1	527.0	0.86	197.9	9.2
13:50	1.7	0.19	6.80	6.76	9.3	527.0	0.91	195.8	8.0
13:53	1.9	0.19	6.80	6.76	9.2	528.9	0.89	193.5	7.7
13:56	2.0	0.19	6.81	6.76	9.0	526.1	0.69	191.8	6.8

Last row of water quality data are considered final field parameters unless otherwise noted.

Water Quality Observations *(clarity, tint, odor, sheen, etc.)*: Clear; colorless; no odor; no sheen.

Sample Information

Sampling Method	Peristaltic Pump		
Sample Name	MW02R-GW-031325		
Sample Date	03/13/2025	Sample Time	14:00

Container Type	Preservative	Filtered (Y/N)	No. Containers
Amber glass	None	N	1
		Total No. Containers:	1

General Comments

Groundwater Field Sampling Data Sheet

MAUL FOSTER ALONGI

Project Information

Project No.	Client Name	Project Name	Sampling Event	Sampler(s)
M0747.01.014	VSF Properties	North Cascade Ford	March 2025	

Well Information

Location ID	Well Type	Monument Type	Depth Measuring Point	Well Diameter (in)	Screen Interval (ft)	Sample Depth (ft)
MW04	Monitoring	Flush-mount	Top of Casing	2.0	4-14	10.0

Hydrology/Level Measurements

Date	Time	Depth to Bottom (ft)	Depth to Product (ft)	Depth to Water (ft)	Product Thickness (ft)	Water Column (ft)	Well Casing Volume (gal)	
		DTB	*DTP*	*DTW*	*DTW - DTP*	*DTB - DTW*	*(gal/ft x water column)*	
03/13/2025	13:30	13.57		6.55		7.02	1.14	*0.75" = 0.023 gal/ft* *1'' = 0.041 gal/ft* *1.5" = 0.092 gal/ft* *2" = 0.163 gal/ft* *3" = 0.367 gal/ft* *4" = 0.653 gal/ft* *6" = 1.469 gal/ft* *8" = 2.611 gal/ft*

Water Quality Data

Purge Method	Peristaltic Pump	*Purge/Sampling Methods: peristaltic pump, submersible pump, vacuum pump, inertia pump, dedicated pump, disposable bailer, bladder pump, other*						
Purge Start Time	13:38	*ideally < 0.3 ft drawdown*	*± 0.1*	*± 3%*	*± 3%*	*± 10% if > 0.5*	*± 10*	*< 5 or ± 10% if > 5*

Time	Cumulative Purge Volume	Flowrate	Water Level	pH	Temperature	Conductivity	Dissolved Oxygen	ORP	Turbidity
	gal	*L/min*	*ft*	*SU*	*degrees C*	*uS/cm*	*mg/L*	*mV*	*NTU*
14:02	1.0	0.16	6.67	6.79	11.7	565	0.64	155.9	1.47
14:05	1.1	0.16	6.67	6.80	11.8	567	0.53	154.3	2.22
14:08	1.2	0.16	6.67	6.80	11.8	564	0.46	150.6	1.75
14:11	1.3	0.16	6.67	6.81	11.7	565	0.45	148.4	1.36
14:14	1.5	0.16	6.67	6.80	11.6	565	0.49	146.9	1.79

Last row of water quality data are considered final field parameters unless otherwise noted.

Water Quality Observations *(clarity, tint, odor, sheen, etc.)*: Clear; colorless; no odor; no sheen.

General Comments

Sample Information

Sampling Method	Peristaltic Pump		
Sample Name	MW04-GW-031325		
Sample Date	03/13/2025	Sample Time	14:15

Container Type	Preservative	Filtered (Y/N)	No. Containers
Amber glass	None	N	1
		Total No. Containers:	1

Groundwater Field Sampling Data Sheet

MAUL FOSTER ALONGI

Project Information

Project No.	Client Name	Project Name	Sampling Event	Sampler(s)
M0747.01.014	VSF Properties	North Cascade Ford	March 2025	B. Murphy, K. Klass

Well Information

Location ID	Well Type	Monument Type	Depth Measuring Point	Well Diameter (in)	Screen Interval (ft)	Sample Depth (ft)
MW07	Monitoring	Flush-mount	Top of Casing	2.0	5-20	12.0

Hydrology/Level Measurements

Date	Time	Depth to Bottom (ft)	Depth to Product (ft)	Depth to Water (ft)	Product Thickness (ft)	Water Column (ft)	Well Casing Volume (gal)
		DTB	*DTP*	*DTW*	*DTW - DTP*	*DTB - DTW*	*(gal/ft x water column)*
03/13/2025	11:15	19.60		4.75		14.85	2.42

0.75" = 0.023 gal/ft
1" = 0.041 gal/ft
1.5" = 0.092 gal/ft
2" = 0.163 gal/ft
3" = 0.367 gal/ft
4" = 0.653 gal/ft
6" = 1.469 gal/ft
8" = 2.611 gal/ft

Water Quality Data

Purge Method: Peristaltic Pump

Purge/Sampling Methods: peristaltic pump, submersible pump, vacuum pump, inertia pump, dedicated pump, disposable bailer, bladder pump, other

Time	Cumulative Purge Volume	Flowrate	Water Level	pH	Temperature	Conductivity	Dissolved Oxygen	ORP	Turbidity
	gal	*L/min*	*ft*	*SU*	*degrees C*	*uS/cm*	*mg/L*	*mV*	*NTU*
Purge Start Time 11:19			*ideally < 0.3 ft drawdown*	*± 0.1*	*± 3%*	*± 3%*	*± 10% if > 0.5*	*± 10*	*< 5 or ± 10% if > 5*
12:19	3.1	0.18	9.20	6.76	9.2	75.8	8.39	166.9	32.8
12:22	3.2	0.18	9.20	6.74	9.3	75.2	8.33	168.8	35.6
12:25	3.4	0.18	9.21	6.71	9.2	75.4	8.40	171.0	33.1
12:28	3.6	0.18	9.21	6.68	9.3	75.6	8.32	172.9	27.5
12:31	3.7	0.18	9.20	6.69	9.4	76.3	8.22	173.2	27.5
12:34	3.8	0.18	9.20	6.67	9.2	76.0	8.36	176.0	25.6

Last row of water quality data are considered final field parameters unless otherwise noted.

Water Quality Observations *(clarity, tint, odor, sheen, etc.)*: Cloudy, then clear; orange, then colorless; no odor; no sheen.

General Comments

Sample Information

Sampling Method	Peristaltic Pump		
Sample Name	MW07-GW-031325		
Sample Date	03/13/2025	Sample Time	12:35
Container Type	**Preservative**	**Filtered (Y/N)**	**No. Containers**
Amber glass	None	N	1
		Total No. Containers:	1

Groundwater Field Sampling Data Sheet

MAUL FOSTER ALONGI

Project Information

Project No.	Client Name	Project Name	Sampling Event	Sampler(s)
M0747.01.014	VSF Properties	North Cascade Ford	March 2025	B. Murphy, K. Klass

Well Information

Location ID	Well Type	Monument Type	Depth Measuring Point	Well Diameter (in)	Screen Interval (ft)	Sample Depth (ft)
MW09R	Monitoring	Flush-mount	Top of Casing	2.0	5-20	13.0

Hydrology/Level Measurements

Date	Time	Depth to Bottom (ft)	Depth to Product (ft)	Depth to Water (ft)	Product Thickness (ft)	Water Column (ft)	Well Casing Volume (gal)
		DTB	*DTP*	*DTW*	*DTW - DTP*	*DTB - DTW*	*(gal/ft x water column)*
03/13/2025	10:28	19.74		6.10		13.64	2.22

0.75" = 0.023 gal/ft
1" = 0.041 gal/ft
1.5" = 0.092 gal/ft
2" = 0.163 gal/ft
3" = 0.367 gal/ft
4" = 0.653 gal/ft
6" = 1.469 gal/ft
8" = 2.611 gal/ft

Water Quality Data

Purge Method	Peristaltic Pump	*Purge/Sampling Methods: peristaltic pump, submersible pump, vacuum pump, inertia pump, dedicated pump, disposable bailer, bladder pump, other*							
Purge Start Time	10:31	*ideally < 0.3 ft drawdown*	*± 0.1*	*± 3%*	*± 3%*	*± 10% if > 0.5*		*± 10*	*< 5 or ± 10% if > 5*
Time	**Cumulative Purge Volume**	**Flowrate**	**Water Level**	**pH**	**Temperature**	**Conductivity**	**Dissolved Oxygen**	**ORP**	**Turbidity**
	gal	*L/min*	*ft*	*SU*	*degrees C*	*uS/cm*	*mg/L*	*mV*	*NTU*
11:21	2.2	0.17	6.10	7.00	7.3	561	4.40	163.8	1.80
11:24	2.3	0.17	6.10	7.00	7.2	560	4.43	163.6	2.10
11:27	2.5	0.17	6.10	7.00	7.2	554	4.56	163.6	1.80
11:30	2.6	0.17	6.10	7.00	7.2	555	4.53	163.5	1.56

Last row of water quality data are considered final field parameters unless otherwise noted.

Water Quality Observations *(clarity, tint, odor, sheen, etc.)*: Clear; colorless; no odor; no sheen.

General Comments

Sample Information

Sampling Method	Peristaltic Pump		
Sample Name	MW09R-GW-031325		
Sample Date	03/13/2025	Sample Time	11:30

Container Type	Preservative	Filtered (Y/N)	No. Containers
Amber glass	None	N	1
		Total No. Containers:	1

Groundwater Field Sampling Data Sheet

MAUL FOSTER ALONGI

Project Information

Project No.	Client Name	Project Name	Sampling Event	Sampler(s)
M0747.01.014	VSF Properties	North Cascade Ford	March 2025	B. Murphy, K. Klass

Well Information

Location ID	Well Type	Monument Type	Depth Measuring Point	Well Diameter (in)	Screen Interval (ft)	Sample Depth (ft)
MW10R	Monitoring	Flush-mount	Top of Casing	2.0	5-20	12.5

Hydrology/Level Measurements

Date	Time	Depth to Bottom (ft)	Depth to Product (ft)	Depth to Water (ft)	Product Thickness (ft)	Water Column (ft)	Well Casing Volume (gal)
		DTB	*DTP*	*DTW*	*DTW - DTP*	*DTB - DTW*	*(gal/ft x water column)*
03/13/2025	12:05	19.72		5.61		14.11	2.30

0.75" = 0.023 gal/ft
1" = 0.041 gal/ft
1.5" = 0.092 gal/ft
2" = 0.163 gal/ft
3" = 0.367 gal/ft
4" = 0.653 gal/ft
6" = 1.469 gal/ft
8" = 2.611 gal/ft

Water Quality Data

Purge Method	Peristaltic Pump	*Purge/Sampling Methods: peristaltic pump, submersible pump, vacuum pump, inertia pump, dedicated pump, disposable bailer, bladder pump, other*							
Purge Start Time	12:13	*ideally < 0.3 ft drawdown*	*± 0.1*	*± 3%*	*± 3%*	*± 10% if > 0.5*		*± 10*	*< 5 or ± 10% if > 5*
Time	**Cumulative Purge Volume**	**Flowrate**	**Water Level**	**pH**	**Temperature**	**Conductivity**	**Dissolved Oxygen**	**ORP**	**Turbidity**
	gal	*L/min*	*ft*	*SU*	*degrees C*	*uS/cm*	*mg/L*	*mV*	*NTU*
12:56	2.0	0.17	5.61	6.98	8.4	474.7	8.40	257.2	0.83
12:59	2.2	0.17	5.61	7.02	8.3	474.5	8.10	257.1	0.87
13:02	2.3	0.17	5.61	7.03	8.3	474.8	8.15	257.1	0.90
13:05	2.4	0.17	5.61	7.04	8.3	474.1	8.03	256.9	0.75

Last row of water quality data are considered final field parameters unless otherwise noted.

Water Quality Observations *(clarity, tint, odor, sheen, etc.)*: Clear; colorless; no odor; no sheen.

Sample Information

Sampling Method	Peristaltic Pump		
Sample Name	MW10R-GW-031325		
Sample Date	03/13/2025	**Sample Time**	13:05

Container Type	Preservative	Filtered (Y/N)	No. Containers
Amber glass	None	N	2
		Total No. Containers:	2

General Comments

Duplicate sample MWDUP-GW-031325 collected here.

Attachment B

Analytical Laboratory Report

MAUL FOSTER ALONGI

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Elizabeth Webber-Bruya
Ann Webber-Bruya
Michael Erdahl
Vineta Mills
Eric Young

5500 4th Ave South
Seattle, WA 98108-2419
(206) 285-8282
office@friedmanandbruya.com
www.friedmanandbruya.com

March 20, 2025

Carolyn Wise, Project Manager
Maul Foster Alongi
114 W Magnolia St, Suite 500
Bellingham, WA 98225

Dear Ms Wise:

Included are the results from the testing of material submitted on March 14, 2025 from the VSF Properties M0747.01.014, F&BI 503215 project. There are 4 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days, or as directed by the Chain of Custody document. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

We appreciate this opportunity to be of service to you and hope you will call if you should have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl
Project Manager

Enclosures
MFA0320R.DOC

CASE NARRATIVE

This case narrative encompasses samples received on March 14, 2025 by Friedman & Bruya, Inc. from the Maul Foster Alongi VSF Properties M0747.01.014, F&BI 503215 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	Maul Foster Alongi
503215 -01	MW01R2-GW-031325
503215 -02	MW02R-GW-031325
503215 -03	MW04-GW-031325
503215 -04	MW07-GW-031325
503215 -05	MW09R-GW-031325
503215 -06	MW10R-GW-031325
503215 -07	MW DUP-GW-031325

All quality control requirements were acceptable.

Date of Report: 03/20/25
Date Received: 03/14/25
Project: VSF Properties M0747.01.014, F&BI 503215
Date Extracted: 03/18/25
Date Analyzed: 03/18/25

RESULTS FROM THE ANALYSIS OF WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL AND MOTOR OIL USING METHOD NWTPH-Dx

Results Reported as ug/L (ppb)

Sample ID Laboratory ID	Diesel Range (C_{10}-C_{25})	Motor Oil Range (C_{25}-C_{36})	Surrogate (% Recovery) (Limit 50-150)
MW01R2-GW-031325 503215-01	76 x	<250	113
MW02R-GW-031325 503215-02	310 x	<250	119
MW04-GW-031325 503215-03	150 x	<250	117
MW07-GW-031325 503215-04	67 x	<250	111
MW09R-GW-031325 503215-05	110 x	<250	110
MW10R-GW-031325 503215-06	90 x	<250	108
MW DUP-GW-031325 503215-07 1/1.2	89 x	<300	108
Method Blank 05-690 MB	<50	<250	106

Date of Report: 03/20/25
Date Received: 03/14/25
Project: VSF Properties M0747.01.014, F&BI 503215

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL EXTENDED USING METHOD NWTPH-Dx

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Percent Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	ug/L (ppb)	2,500	96	104	65-151	8

Data Qualifiers & Definitions

a - The analyte was detected at a level less than five times the reporting limit. The RPD results may not provide reliable information on the variability of the analysis.

b - The analyte was spiked at a level that was less than five times that present in the sample. Matrix spike recoveries may not be meaningful.

ca - The calibration results for the analyte were outside of acceptance criteria, biased low; or, the calibration results for the analyte were outside of acceptance criteria, biased high, with a detection for the analyte in the sample. The value reported is an estimate.

c - The presence of the analyte may be due to carryover from previous sample injections.

cf - The sample was centrifuged prior to analysis.

d - The sample was diluted. Detection limits were raised and surrogate recoveries may not be meaningful.

dv - Insufficient sample volume was available to achieve normal reporting limits.

f - The sample was laboratory filtered prior to analysis.

fb - The analyte was detected in the method blank.

fc - The analyte is a common laboratory and field contaminant.

hr - The sample and duplicate were reextracted and reanalyzed. RPD results were still outside of control limits. Variability is attributed to sample inhomogeneity.

hs - Headspace was present in the container used for analysis.

ht – The analysis was performed outside the method or client-specified holding time requirement.

ip - Recovery fell outside of control limits due to sample matrix effects.

j - The analyte concentration is reported between the method detection limit and the lowest calibration point. The value reported is an estimate.

J - The internal standard associated with the analyte is out of control limits. The reported concentration is an estimate.

jl - The laboratory control sample(s) percent recovery and/or RPD were out of control limits. The reported concentration should be considered an estimate.

js - The surrogate associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

k – The calibration results for the analyte were outside of acceptance criteria, biased high, and the analyte was not detected in the sample.

lc - The presence of the analyte is likely due to laboratory contamination.

L - The reported concentration was generated from a library search.

nm - The analyte was not detected in one or more of the duplicate analyses. Therefore, calculation of the RPD is not applicable.

pc - The sample was received with incorrect preservation or in a container not approved by the method. The value reported should be considered an estimate.

ve - The analyte response exceeded the valid instrument calibration range. The value reported is an estimate.

vo - The value reported fell outside the control limits established for this analyte.

x - The sample chromatographic pattern does not resemble the fuel standard used for quantitation.

508215

SAMPLE CHAIN OF CUSTODY

03/14/25 I3

Page # 1 of 1

Report To Carolyn Wise
Company Maul Foster & Along
Address 114 W Magnolia Street, Suite 500
City, State, ZIP Bellingham, WA 98225
Phone 360-690-5982 Email cwise@maulfoster.com

SAMPLERS (*signature*) Brenden Murphy

PROJECT NAME: VST Properties
PO#: M0747.01.014

REMARKS
Project specific RLs? - Yes / No

INVOICE TO: accounting@maulfoster.com

TURNAROUND TIME
☒ Standard turnaround
☐ RUSH
Rush charges authorized by:

SAMPLE DISPOSAL
☐ Archive samples
☐ Other
Default: Dispose after 30 days

Sample ID	Lab ID	Date Sampled	Time Sampled	Sample Type	# of Jars	NWTPH-Dx	NWTPH-Gx	BTEX EPA 8021	NWTPH-HCID	VOCs EPA 8260	PAHs EPA 8270	PCBs EPA 8082					Notes
						ANALYSES REQUESTED											
MW01R2-GW-031325	01	3/13/25	10:50	Water	1	X											
MW02R-GW-031325	02	"	14:00	"	1	X											
MW04-GW-031325	03	"	14:15	"	1	X											
MW07-GW-031325	04	"	12:35	"	1	X											
MW09R-GW-031325	05	"	11:30	"	1	X											
MW10R-GW-031325	06	"	13:05	"	1	X											
MWDUP-GW-031325	07	"	13:05	"	1	X											
									Samples received at 1 °C								

SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
Relinquished by: Brenden Murphy	Brenden Murphy	MFA	3/13/25	15:50
Received by:	Anh Pham	FBI	3/14/25	09:41
Relinquished by:				
Received by:				

Friedman & Bruya, Inc.
5500 4th Ave S.
Seattle WA 98108
(206) 285-8282
office@friedmanandbruya.com

SAMPLE CONDITION UPON RECEIPT CHECKLIST

PROJECT # 503215 CLIENT MFA INITIALS/ DATE: AP 03/14/25

If custody seals are present on cooler, are they intact? ☒ NA ☐ YES ☐ NO

Cooler/Sample temperature 1 °C
Thermometer ID: Fluke 96312917

Were samples received on ice/cold packs? ☒ YES ☐ NO

How did samples arrive?
☐ Over the Counter ☐ Picked up by F&BI ☒ FedEx/UPS/GSO

Is there a Chain-of-Custody* (COC)? ☒ YES ☐ NO Initials/ AP Date: 03/14/25
*or other representative documents, letters, and/or shipping memos

Number of days samples have been sitting prior to receipt at laboratory 1 days

Are the samples clearly identified? (explain "no" answer below) ☒ YES ☐ NO

Were all sample containers received intact (i.e. not broken, leaking etc.)? (explain "no" answer below) ☒ YES ☐ NO

Were appropriate sample containers used? ☒ YES ☐ NO ☐ Unknown

If custody seals are present on samples, are they intact? ☒ NA ☐ YES ☐ NO

Are samples requiring no headspace, headspace free? ☒ NA ☐ YES ☐ NO

Is the following information provided on the COC, and does it match the sample label?
(explain "no" answer below)

Sample ID's	☒ Yes ☐ No	☐ Not on COC/label
Date Sampled	☒ Yes ☐ No	☐ Not on COC/label
Time Sampled	☒ Yes ☐ No	☐ Not on COC/label
# of Containers	☒ Yes ☐ No	
Relinquished	☒ Yes ☐ No	
Requested analysis	☒ Yes ☐ On Hold	

Other comments (use a separate page if needed)

Air Samples: Were any additional canisters/tubes received? ☒ NA ☐ YES ☐ NO

Number of unused TO15 canisters** _____ **Number of unused TO17 tubes** _____
**Fill out Green manifolds billing sheet

ORIGIN ID:ODWA (360) 433-0251
MAUL FOSTER & ALONGI
114 W MAGNOLIA ST

BELLINGHAM, WA 98225
UNITED STATES US

SHIP DATE: 13MAR25
ACTWGT: 31.60 LB
CAD: 6570778/ROSA2610
DIMS: 16x15x13 IN

BILL THIRD PARTY

Part # 156297-435 HARP EDS 01/26

TO FREEDMAN & BRUYA
M0747.01.014
5500 4TH AVE S

SEATTLE WA 98108
(000) 000-0000
INV:
PO:
REF:
DEPT:

FedEx Express

J25102412170 1ea

TRK# 0201 7727 0653 7783

FRI - 14 MAR 10:30A
PRIORITY OVERNIGHT

85 BFIA

AHS
98108
WA-US SEA

Attachment C

Data Validation Memorandum

MAUL
FOSTER
ALONGI

Data Validation Memorandum

Project No. M0747.01.014 | March 27, 2025 | VSF Properties

Maul Foster & Alongi, Inc. (MFA), conducted an independent Stage 2A review of the quality of analytical results for groundwater and associated quality control samples collected on March 13, 2025 at the North Cascade Ford property located at 116 W Ferry Street in Sedro-Woolley, Washington.

Friedman & Bruya (F&B) performed the analyses. MFA reviewed F&B report number 503215. The analysis performed and the samples analyzed are listed in the following tables.

Analysis	Reference
Diesel- and oil-range hydrocarbons	NWTPH-Dx

Notes
NWTPH = Northwest Total Petroleum Hydrocarbons.

Samples Analyzed	
Report 503215	
MW01R2-GW-031325	MW09R-GW-031325
MW02R-GW-031325	MW10R-GW-031325
MW04-GW-031325	MW DUP-GW-031325
MW07-GW-031325	--

Data Validation Procedures

Analytical results were evaluated according to applicable sections of U.S. Environmental Protection Agency (EPA) guidelines for data review (EPA 2020) and appropriate laboratory- and method-specific guidelines (EPA 1986, F&B 2024).

Data validation procedures were modified, as appropriate, to accommodate quality control requirements for methods that EPA data review guidelines do not specifically address (e.g., Northwest Total Petroleum Hydrocarbons [NWTPH]-Dx).

Based on the data quality assurance/quality control review described herein, the data, with the appropriate final data qualifiers assigned, are considered acceptable for their intended use. Final data qualifiers represent qualifiers originating from the laboratory and accepted by the reviewer, and data qualifiers assigned by the reviewer during validation.

Final data qualifier:

- U = result is non-detect at the method reporting limit (MRL).

General Qualifications

According to report 503215, the NWTPH-Dx diesel-range hydrocarbons result for all samples were flagged by the laboratory as having a chromatographic pattern that did not resemble the fuel standard used for quantitation. The result was reported as diesel-range hydrocarbons instead of specific fuel products; thus, qualification was not required.

Sample Conditions

Sample Custody

Sample custody was appropriately documented on the chain-of-custody (COC) form accompanying the report.

The reviewer confirmed that the gap in custody on the COC form accompanying report 503215 is due to shipment via a third-party service.

Holding Times

Extractions and analyses were performed within the recommended holding times.

Preservation and Sample Storage

The samples were preserved and stored appropriately.

Reporting Limits

The laboratory evaluated results to MRLs.

The reviewer confirmed that when samples were diluted for analysis or when a higher sample volume was used for the extraction, F&B provided the preparation or dilution factor after the laboratory sample identification number. (e.g. 503215-07 1/1.2). The sample that required dilution because of dilution necessary for preparation and/or analysis were reported with raised MRLs.

Blank Results

Method Blanks

Laboratory method blanks are used to evaluate whether laboratory contamination was introduced during sample preparation and analysis. Laboratory method blank analyses were performed at the required frequencies, in accordance with laboratory- and method-specific requirements.

All laboratory method blank results were non-detect to MRLs.

Equipment Rinsate Blanks

Equipment rinsate blanks are used to evaluate the adequacy of the field equipment decontamination process when decontaminated sampling equipment is used to collect samples.

Equipment rinsate blanks were not required for this sampling event, as all samples were collected using dedicated or single-use equipment.

Laboratory Control Sample and Laboratory Control Sample Duplicate Results

Laboratory control sample (LCS) and laboratory control sample duplicate (LCSD) results are used to evaluate laboratory precision and accuracy. All LCSs and LCSDs were prepared and analyzed at the required frequency, in accordance with laboratory- and method-specific requirements.

All LCS and LCSD results were within acceptance limits for percent recovery and relative percent difference (RPD).

Laboratory Duplicate Results

Laboratory duplicate results are used to evaluate laboratory precision and sample homogeneity. Laboratory duplicates were not included in report 503215 as batch precision was evaluated based on the LCS and LCSD results.

Matrix Spike and Matrix Spike Duplicate Results

Matrix spike (MS) and matrix spike duplicate (MSD) results are used to evaluate laboratory precision, accuracy, and the effect of the sample matrix on sample preparation and target analyte recovery. MS and MSDs were not included in report 503215 as batch precision and accuracy were evaluated based on the LCS and LCSD results.

Surrogate Results

Surrogate results are used to evaluate laboratory performance of target organic compounds for individual samples.

All surrogate results were within percent recovery acceptance limits.

Field Duplicate Results

Field duplicate results are used to evaluate field precision and sample homogeneity. The following field duplicate and parent sample pair was submitted for analysis:

Report	Parent Sample	Field Duplicate Sample
503215	MW10R-GW-031325	MWDUP-GW-031325

MFA uses acceptance criteria of 100 percent RPD for results that are less than five times the MRL or 50 percent RPD for results that are greater than five times the MRL. RPD was not evaluated when both results in the sample pair were non-detect.

All field duplicate results met the RPD acceptance criteria.

Data Package

The data package was reviewed for transcription errors, omissions, and anomalies.

None were found.

References

EPA. 1986. *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods.* EPA publication SW-846. 3rd ed. U.S. Environmental Protection Agency. Final updates I (1993), II (1995), IIA (1994), IIB (1995), III (1997), IIIA (1999), IIIB (2005), IV (2008), V (2015), VI phase I (2017), VI phase II (2018), VI phase III (2019), VII phase I (2019), and VII phase II (2020).

EPA. 2020. *National Functional Guidelines for Organic Superfund Methods Data Review.* EPA 540-R-20-005. U.S. Environmental Protection Agency, Office of Superfund Remediation and Technology Innovation: Washington, DC. November.

F&B. 2024. Quality Assurance Manual. Rev. 19. Friedman & Bruya, Inc.: Seattle, WA. October 9.